LAW OFFICES OF
CAREY S. ROSEMARIN, P.C.
847-897-8000

500 SKOKIE BOULEVARD, SUITE 510
NORTHBROOK, ILLINOIS 60062

Fax: 312-896-5786
csr@rosemarinlaw.com

April 6, 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO: See Attached Service List

Re:
- *SPX Corporation Property Located at 304 Hart Street, Watertown, Wisconsin*
- *Notices of Intent to Sue Pursuant to:*

1) *Resource Conservation and Recovery Act, 42 U.S.C. § 6972(a)(1)(B)*
2) *Toxic Substances Control Act, 15 U.S.C. § 2619(1)(a)*
3) *Clean Air Act, 42 U.S.C. § 7604(a)(1)*

Dear Notice Recipients:

This law firm represents William and Nancy Liebhart and their son and daughter-in-law, Jacob and Emily Liebhart (collectively, the "Liebharts'"). This letter comprises three notices of intent to sue the persons identified herein as "Respondents" by each of the Liebharts'. One notice is issued pursuant to the "Citizen suits" provisions of the Resource Conservation Recovery Act, 42 U.S.C. § 6972(a)(1)(B); another is issued pursuant to the "Citizens' civil actions" provisions of the Toxic Substances Control Act, 15 U.S.C. § 2619(1)(a); and the final notice is issued pursuant to the "Citizen suits" provisions of the Clean Air Act, 42 U.S.C. § 7604(a).

The persons to whom these notices are directed ("Respondents") are SPX Corporation, of Charlotte, North Carolina ("SPX"); Apollo Dismantling, Inc., of Niagara Falls, New York ("Apollo"); TRC Solutions, Inc., of Windsor, Connecticut ("TRC"); Badger Asbestos Abatement, Inc., of Milwaukee, Wisconsin and Badger Asbestos and Mold Abatement, Inc., of New Berlin, Wisconsin (collectively, "Badger")[1].

William and Nancy Liebhart reside at 1115 South Third Street, Watertown, Wisconsin 53094. They own the parcel of property at that address, as well as three other parcels on South

[1] Records that have been made available to date are ambiguous as to whether Badger Asbestos Abatement, Inc., (which Wisconsin Secretary of State records show to be dissolved) or Badger Asbestos and Mold Abatement, Inc., or both, were involved in the demolition and/or remediation of the SPX facility. Therefore, this notice is being sent to both entities.

Third Street, commonly known as 1113, 1117 and 1129 South Third Street. The parcels at 1115 and 1117 are adjacent to each other and together, serve as the site of William and Nancy Liebhart's principal residence, which they have continuously occupied throughout all relevant time periods. Jacob and Emily also occupied that residence, but no longer do so. Single family homes are present on 1113 and 1129 South Third, and they were also occupied during all relevant time periods. A children's day care center is located on the west side of South Third Street; its address is believed to be 1118.

All four of the Liebharts' parcels abut industrial property to the east, commonly known as 304 Hart Street, Watertown, Wisconsin. That property is owned by SPX and consists of approximately 5.3 acres. Until recently, a large industrial facility was located on the property. Transformers and other equipment were formerly manufactured there. The facility ceased to operate in approximately 2005 and appears to have remained idle for the ensuing decade. But as explained below, the facility harbored large quantities of asbestos and polychlorinated biphenyls ("PCBs").

In 1999 Badger conducted an asbestos survey for SPX's predecessor. The survey disclosed a considerable amount of asbestos throughout many areas of the facility in varying stages of deterioration. Badger's report stated, " . . . many areas within your plant require at least the minimum response actions noted within this report to protect your workers from asbestos exposure."

In 2009 SPX reportedly discovered that concrete in the facility was contaminated with PCBs and the following year SPX engaged Delta Consultants, of Shoreview, Minnesota ("Delta") to determine the extent of contamination. Delta confirmed the existence of Aroclor 1260 throughout large areas of the facility, particularly on the concrete floors, and reported concentrations of up to 3,310 ppm of Aroclor 1260.

In or around 2014 SPX decided to demolish the facility. It retained TRC to oversee the demolition, as well as the remediation of both the asbestos and the PCBs. The demolition appears to have been accomplished between February and July 2015, and was performed by Apollo. Badger was engaged to perform the asbestos abatement at the facility, and Apollo may also have participated in that project. It is believed that the asbestos abatement was conducted on various dates between October 2014 and July 2015.

On or about December 22, 2014, TRC submitted a document entitled, "Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste" ("PCB Plan"), purportedly written pursuant to 40 CFR 761.61, to U.S.EPA Region 5. The PCB Plan stated that SPX would remediate PCBs to 0.74 ppm, Wisconsin's PCB soil cleanup standard for industrial/commercial property uses. It also stated the property would not be suitable for residential use; Wisconsin's PCB soil cleanup standard for residential property uses was 0.22 ppm. WI ADC § 720.07.

U.S.EPA communicated its conditional approval of the PCB Plan by a letter dated February 2, 2015. U.S.EPA's conditions required SPX to submit a completion report, containing verification sampling results and other information, within 60 days of completion of the remediation. Apollo performed the PCB cleanup and demolition.

While the industrial facility was still standing, its western wall was separated from the Liebhart residence and the other Liebhart parcels by only a narrow walkway. Therefore, it was obvious that precautions would have to be taken to avoid the release of PCBs and asbestos to the Liebharts' properties. Yet, on more than one occasion, asbestos inspections by the Wisconsin Department of Natural Resources ("WDNR") found visible emissions to the outside air, and regulated asbestos-containing material strewn about the facility in violation of 40 CFR § 61.145. Additionally, the PCB removal and demolition were conducted recklessly, and caused the release of large quantities of PCB-laden particulates, which settled on the Liebharts' properties and presumably elsewhere. Immediately after the demolition commenced, the Liebharts' experienced the onset of various health problems, including acute sinusitis, lymphadenopathy, conjunctivitis and bronchitis, which their physician contemporaneously attributed to their exposure to the demolition dust.

The carelessness with which the remediation and demolition were undertaken was graphically shown in the video contained on the enclosed disc. The video was taken and narrated by Ms. Liebhart on April 3, 2015, while she was standing at the rear (east side) of the residence. It shows the demolition and large clouds of wind-blown demolition dust drifting toward the Liebharts' properties.

William Liebhart reported this matter to both the Watertown Health Department and the WDNR, both of which contacted SPX through both TRC and Apollo. About two months after the demolition began, SPX caused TRC to collect surface soil samples from the Liebharts' properties, including one from the vegetable garden in the backyard of the Liebhart residence. The laboratory analytical results showed the vegetable garden sample to contain 5.81 ppm of Aroclor 1260.

SPX and other Respondents blatantly violated 40 CFR §761.79(e)(1), which reads in its entirety as follows:

> (e) Limitation of exposure and control of releases.
>
> (1) Any person conducting decontamination activities under this section shall take necessary measures to protect against release of PCBs to the environment from the decontamination area.

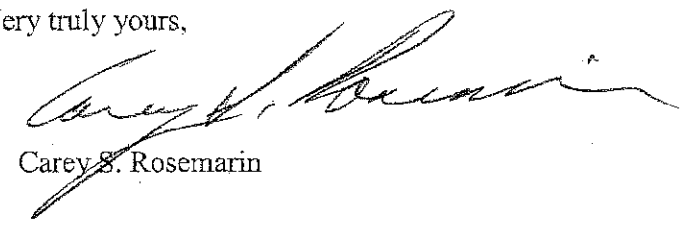
SPX and other Respondents have violated and continue to violate 40 CFR §761.61 because they have not conducted a cleanup verification in accordance with 40 CFR § 761.61(a)(6). They have also violated the conditions of the February 2, 2015 approval because

they have not submitted to U.S.EPA: i) a completion report (due within 60 days of the completion of the plan); nor ii) a draft deed notice restricting the future use of the property.

Additionally, SPX and other Respondents have failed to comply in any fashion with 40 CFR Part G, the "Spill Cleanup Policy." SPX and other Respondents discovered that the demolition contaminated the Liebharts' vegetable garden with Aroclor 1260 fully ten months ago, and subsequently discovered it had similarly contaminated the Liebharts' properties over a much broader area. Yet, neither SPX nor other Respondents have complied with either the reporting requirements or remedial requirements of 40 CFR §61.125.

Respondents' continuing violations of the PCB regulations cited above subject them to a civil action under 15 U.S.C. § 2619, and their repeated violations of the asbestos regulations cited above subject them to a civil action under 42 U.S.C. § 7604(a). By virtue of these actions and by virtue of Respondents' continued failure to properly address and remediate the release of asbestos and PCBs, Respondents have contributed to and are contributing to the disposal of hazardous wastes which may present an imminent and substantial endangerment to health or the environment. Such contribution thereby subjects Respondents to a citizen suit under 42 U.S.C. § 6972(a)(1)(B).

Very truly yours,



Carey S. Rosemarin

Service List

Via Certified Mail
Return Receipt Requested
w/enclosed disc

United States

Gina McCarthy
Administrator
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N. W.
Mail Code 1101A
Washington, DC 20460

Robert A. Kaplan
Acting Regional Administrator
Region 5
77 West Jackson Boulevard
Mail Code R-19J
Chicago, IL 60604-3507

State of Wisconsin

Office of Governor Scott Walker
115 East Capitol
Madison, WI 53702

Cathy L. Stepp
Secretary
Wisconsin Department of Natural Resources
101 South Webster Street
P.O. Box 921
GEF2 DNR Central Office
Madison, WI 53707-7921

SPX Corporation

Gene Lowe
President and Chief Executive Officer
SPX Corporation
13320-A Ballantyne Corporate Place
Charlotte, NC 28277

CT Corporation System
Registered Agent for SPX Corporation
8020 Excelsior Drive
Suite 200
Madison, WI 53717

Apollo Dismantling Services, LLC

Samuel DeFranks
President
Apollo Dismantling Services, LLC
4511 Hyde Park Boulevard
2nd Floor
Niagara Falls, NY 14305

Business Filings Incorporated
Registered Agent for Apollo Dismantling Services, LLC
8020 Excelsior Drive, Suite 200
Madison, WI 53717

TRC Solutions, Inc.

Christopher P. Vincze
Chairman and Chief Executive Officer
TRC Companies, Inc.
9685 Research Drive
Irvine, CA 92618

C T Corporation System
Registered Agent for TRC Solutions, Inc.
8020 Excelsior Drive, Suite 200
Madison, WI 53717

Badger Asbestos and Mold Abatement, Inc.

Mark J. Andrus
Registered Agent
Badger Asbestos and Mold Abatement, Inc.
5255 S. Brennan Drive
New Berlin, WI 53146

Badger Asbestos Abatement, Inc.

Robert Frank Semrad
Registered Agent
Badger Asbestos Abatement, Inc.
2400 Merlin Way
Brookfield, WI 53045

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece or on the front if space permits.

1. Article Addressed to:

Mr. Daniel McGrade
Environmental Director
SPX Corporation
13515 Ballantyne Corporate Place
Charlotte, North Carolina 28277

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* | B. Date of Delivery: 03/31

C. Signature: X

☑ Agent
☑ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

Ballantyne STA Charlotte NC 28217 USPS

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☑ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
(Transfer from service label) 7001 0320 0006 0192 5183

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 28 2011

REPLY TO THE ATTENTION OF:
L-8J

CERTIFIED MAIL:
RETURN RECEIPT REQUESTED

Mr. Daniel McGrade
Environmental Director
SPX Corporation
13515 Ballantyne Corporate Place
Charlotte, North Carolina 28277

Dear Mr. McGrade:

The U.S. Environmental Protection Agency, Region 5 has reviewed the Risk-Based Remediation Plan (Plan) dated August 11, 2010 and the subsequently revised plan of December 6, 2010, prepared and submitted by Delta Consultants of Shoreview, Minnesota, on behalf of SPX Corporation, for the SPX Lindberg facility (SPX) in Watertown, Wisconsin. EPA hereby approves the Plan subject to the attached conditions.

In summary, the Plan calls for a Risk-Based Remediation/clean-up and disposal of Polychlorinated Biphenyl (PCB) impacted concrete at SPX's subject manufacturing facility in Watertown, Wisconsin in accordance with the EPA Toxic Substance Control Act (TSCA) PCB regulations 40 CFR§ 761.61(c). Industrial land use restrictions shall apply to the property for all future uses.

Based on facility-wide sampling it was determined that approximately 20,650 square feet of concrete contains PCB at concentrations greater than 10 mg/kg. The following remediation methods are being proposed for the facility to address the areas with PCB concentrations greater than 10 mg/kg (proposed risk-based clean up level) conditioned upon its continued industrial use and limited accessibility.

a) Bulk PCB Remediation Waste Removal and off-site disposal of a 700 square foot concrete pad in the rail spur loading area is proposed. In addition, bulk PCB Remediation Waste Removal and off-site disposal of approximately 800 square feet of PCB contaminated concrete flooring located at eight (8) non-contiguous locations each approximately 10 feet by 10 feet is also in the Plan.

b) Continued Use Authorization management as per 40 CFR § 761.30(p) of 19,150 square feet of PCB contaminated bare concrete. The flooring shall be divided into two distinct areas based on the surface condition of the concrete. The first area (12,150 square feet) which is the bare concrete portion shall undergo cleaning per Subpart S of the regulations followed by two coats of epoxy. The second area

(7,000 square feet), the portion presently covered with a white epoxy coating, shall be subjected to a superficial cleaning followed by two coats of epoxy.

This approval of the Plan, as described above , is granted by EPA in accordance with the federal PCB regulations codified under 40 CFR§761.61(c), under which the Regional Administrator may approve a Risk-Based disposal approval application, if it is found that the method will not pose an unreasonable risk of injury to human health or the environment. The Regional Administrator has redelegated this approval authority to the Director of Land and Chemicals Division. PCB remediation and clean-up activities will need to be conducted in accordance with the report dated August 11, 2010 and subsequently revised per the e-mail and its attachment dated December 6, 2010.

SPX is responsible for ensuring continued compliance with all applicable provisions of the Toxic Substances Control Act (TSCA), the federal PCB regulations and the Conditions of this approval, attached herewith. All conditions of this approval and other applicable requirements of TSCA and its regulations will continue to apply to the site after any transfer in ownership.

Please do not hesitate to call Nate Nemani, of my staff, at (312) 886-3224, if you have any questions regarding this approval.

Sincerely,

Richard C Karl
Acting Director
Land and Chemicals Division

Enclosure

cc: Jeff Ackerman, Wisconsin Department of Natural Resources (WDNR)
Karen Thole, Delta Consultants

APPROVAL CONDITIONS

A. Authorized Remedial Action

1. SPX is authorized to clean-up and dispose of PCB remediation waste at its facility in Watertown, Wisconsin facility located at 304 Hart Street (Site) according to the procedures described in the August 11, 2010 report titled Risk-Based Remediation Plan for PCB Contaminated Concrete and the subsequent revisions described in the December 6, 2010 email and its attachments. It is noted that the source of the PCB contaminated does not exist any longer. The following requirements need to be adhered to:

   a) **Bulk PCB Remediation Waste Removal and Disposal:**
   SPX will remove a 16 foot by 43 foot concrete pad located in the rail spur loading area. In addition to the rail spur loading area, eight (8) non-contiguous concrete sample locations will undergo similar removal and disposal. Given the limited area and vertical extent of PCBs in these eight locations, SPX will cut out and remove the entire thickness of a 10 foot by 10 foot concrete floor surrounding each sample location where the concentrations exceeded 10 mg/kg. The disposal of the material will be at a TSCA permitted Landfill in accordance with regulations under 40 CFR§761.61(a)(5)(i)(B)(2).

   b) **Continued Use Authorization:**
   In accordance with requirements set forth in 40 CFR 761.30(p), porous surfaces contaminated by an old liquid PCB spill where the surface concentration is greater than 10 micrograms per 100 square centimeters are subjected to the continued use provisions, which state that (i) the accessible porous surfaces must be cleaned and completely covered with two solvent resistant and water repellant coatings of contrasting colors and (ii) a visible PCB mark be placed in a visible location. As described earlier, the area where the surface concentrations exceeded 10 micrograms per 100 square centimeters (12,150 square feet) shall be subjected to a more rigorous cleaning than the areas that exhibited concentrations less than or equal to 10 micrograms per 100 square centimeters (7,000 square feet).

   In summary, the remediation and clean-up at the SPX facility shall be as per the procedures outlined in the revised section 3.0 titled **Clean-up Plan** detailed in the attachment to the December 6, 2010 e-mail from Ms. Karen Thole of Delta Consultants. The original plan was detailed in the report titled **Risk-Based Remediation for PCB-Contaminated Concrete,** dated August 11, 2010.

c) **Property Use and Restrictions and Notice:**
Within 60 days of completion of the above approved removal activities, SPX will record, in accordance with state law and 40 CFR 761.61(a)(8)(i), a notation to the deed for the Facility. A **draft** of the Deed Notice shall be submitted to EPA for review prior to its official filing with the appropriate local governmental body. A written certification indicating that the deed restriction has been filed will need to be submitted to the EPA Regional Administrator.

B. Inspection, Maintenance and Monitoring

Plans for the Long Term Management of the PCB affected concrete shall be put in place for implementation as needed. An Operations and Maintenance Plan shall be developed for minimizing human exposures. This shall include training of workers for inspecting the encapsulant for wear and damage, procedures for repairing the encapsulant as needed and a safety plan for workers in case repair of the area is required. The management plan shall also include addressing the ultimate removal and disposal of PCB contaminated concrete and soil remaining beneath the encapsulant in the event of building demolition or renovation. Any concrete containing PCB concentrations >1ppm must be disposed of per 40 CFR§761.61.

C. Change of Ownership

1. At least 45 days before conveying, in any manner, ownership or responsibility of the Facility or underlying property SPX will notify EPA Region 5, of its intent to convey such ownership or responsibility. Such notice will include the date of the intended conveyance, and the name, address, and phone number of the intended new owner or responsible person. If the conveyance is being made to a corporate entity, this notice will also include the name of a contact person.

2. At least 30 days before such conveyance, SPX will submit to EPA, Region 5, a notarized affidavit signed by the intended new owner or responsible person who states that such person will abide by the provisions of this Risk-Based Approval granted to SPX for this Facility.

D. Record-keeping and Reporting

1. SPX will maintain all records and documents as required by 40 CFR Part 761.

2. SPX will submit a Closure Certification Report to EPA and WDNR within 90 days of completion of the activities described under this Approval. At a minimum, the report will include: a discussion of project activities, as-built specifications, sampling analytical results, copies of the accompanying analytical chains of custody, quality control/quality assurance checks, an estimate of the quantity of PCBs removed and disposed of off-site, and copies of manifests.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

SELF-IMPLEMENTING CLEANUP AND DISPOSAL § 761.61(a)(3) CHECKLIST

I. Cleanup and Disposal Notification to EPA with the following:

- ☐ Cover letter stating purpose of the submission and signed by the Site owner or operator, or by the party responsible for conducting the cleanup, such as a former Site owner.
- ☐ A plan which includes the following information:
  - ☐ Site background and history. This should include a discussion of past activities (e.g. use of PCBs and/or PCB equipment, storage, manufacturing, etc), site ownership, and current or proposed site uses. This section should also include information on any cleanups/remediations that have occurred at the Site.
  - ☐ The nature of the contamination, including the kinds of materials contaminated (§ 761.61(a)(3)(i)(A)).
  - ☐ A summary of the standard operating procedures (SOPs) employed during characterization of the Site, including a table or cleanup Site map showing PCB concentrations measured in the pre-cleanup characterization samples. The SOPs must include information on the field sample collection procedures and field and/or laboratory extraction and analytical procedures (§ 761.61(a)(3)(i)(B)).
  - ☐ A Site map showing the PCB sampling locations cross referenced to the sample identification numbers provided as part of the characterization information. The extent of the identified PCB contaminated area(s) must be clearly identified (§ 761.61(a)(3)(i)(C)).

☐ Copies of the laboratory analytical reports of the characterization sampling, including field and laboratory quality assurance/quality control samples, should be provided to document the extraction/analytical dates and methods and laboratory QC (§ 761.61(a)(3)(i)(C)).

If extensive, the laboratory analytical reports may be provided on a CD-ROM.

☐ A cleanup plan for the Site, including the proposed disposal technology and approach, and a cleanup schedule. ***The plan must include contingency plans in the event that higher PCB concentrations and/or a wider distribution of PCBs are identified during the cleanup*** (§ 761.61(a)(3)(i)(D)).

☐ A written certification, signed by the owner of the property where the cleanup site is located and the party conducting the cleanup, that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file at the location designated in the certificate, and are available for EPA inspection (§ 761.61(a)(3)(i)(E)).

☐ Subpart Q alternative method: If an alternative method of extraction and/or analysis is/will be used, the certification shall include a statement to this fact and that a comparison study which meets or exceeds the requirements of Subpart Q has been completed prior to the verification sampling. In the event that the alternative extraction and/or analytical method was previously validated under Subpart Q using materials from other projects, the laboratory must provide a certification that the sample types used during that comparison study are similar to (e.g., % organic content, grain size, etc) the sample types that will be cleaned up under the Notification. A copy of the Subpart Q comparison study should be included in the Notification (§ 761.61(a)(3)(i)(E)).

☐ QA/QC plan for documenting that the cleanup levels have been achieved (e.g. confirmatory sampling/analysis QA/QC). The QA/QC plan should at a minimum include information on the types/numbers of samples; extraction/analytical methods; MS/MSDs (both frequency and acceptance criteria), etc. The QA/QC plan should also discuss data validation.

- ☐ In the event that the party conducting the cleanup is not the Site owner (for example, the party could be a previous Site owner), EPA will require documentation that the party conducting the cleanup legally has the authority to access the Site and to conduct the proposed PCB activities. This documentation for example may be in the form of a Site Access Agreement stating this fact or perhaps in a lease agreement or a property transfer agreement.

- ☐ If a cleanup will involve the use of a cap, the cap design specifications and a cross-section showing the design should be provided. Please insure that it is clear where the cap will be used. ***Please note: the use of a cap will require a deed notation documenting this fact and the limitations on the use of the Site*** (§§ 761.61(a)(7) and (8)).

II. **Important Considerations:**

This checklist provides only a summary of the information that is specified under § 761.61(a)(3), is for reference only, and is not intended to replace the requirements of the PCB regulations.

Region 1 requires that the SOPs and QA/QC information be submitted as part of the Notification.

The Notification may include any additional information that supports the proposed cleanup, such as information regarding state regulations, community involvement (especially for schools), and environmental justice communities. In addition, any documentation that has been developed for a state regulatory agency, such as a remedial investigation report, may be submitted to support the pertinent required documentation in lieu of generating a new document.

The 30-day default timeframe for EPA review of a Self-Implementing PCB Cleanup and Disposal Notification (§ 761.61(a)(3)(ii)) does not apply if the proposed PCB plan does not follow the prescriptive cleanup and disposal procedures and provisions specified under § 761.61(a).

Nemani, Nate

From: McNichol, David <DMcNichol@trcsolutions.com>
Sent: Friday, January 02, 2015 10:30 AM
To: Nemani, Nate
Cc: Galacki, Walter; Sam Defranks
Subject: Watertown

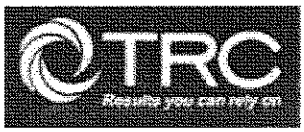
Dear Mr. Nemani

I just wanted to follow up on the Revised Certification, Notification and Cleanup Plan Document which I transmitted to you on 22 Dec 2014.

Should you have any questions please contact me via my cell phone below or email me as I will be travelling and not available through the office until 19 Jan 2015.

Best wishes for a great New Year, 2015!

Dave McNichol
Senior Consultant



500 Bic Drive, Ste. 103, Milford, CT 06461
T: 203.876.1453 | F: 203.876.1486 | C: 203.856.8388

dmcnichol@trcsolutions.com

Re: SPX--- PCB Approval Letter
Peter Ramanauskas to: Nemani.Nate 03/02/2011 02:43 PM

Nate,

Thanks for the opportunity to review your draft. I've made some edits and comments in Track Changes in the attachment.

One main question: we were OK with allowing no coatings for concrete where detections were < 10 mg/kg given an Industrial Use restriction? Did you check in with Mario on the revised plan? My notes say there were no wipe samples at the facility > 10 ug/100cm2 - is that correct? Also, maybe we should ask to see a draft of the use restriction?

Lastly, once we're comfortable with our draft, do you think it would be good to share it with SPX?

Let me know if you'd like to discuss.

Thanks!
Peter

SPX Lindberg Wisc. Risk based Remediation Plan EPA Approval Ltr FINAL 022511 PR Edits.doc

Nate Nemani Peter: Please look at the Attached letter and if it... 02/25/2011 03:44:31 PM

From: Nate Nemani/R5/USEPA/US
To: Peter Ramanauskas/R5/USEPA/US@EPA
Date: 02/25/2011 03:44 PM
Subject: SPX--- PCB Approval Letter

Peter:

Please look at the Attached letter and if it is OK, and offer any suggestions/comments on the same.

Following this step, my intent is to initiate the sign-offs next week and send it out by 3/10 if possible.

Thanks

Nate

[attachment "SPX Lindberg Wisc. Risk based Remediation Plan EPA Approval Ltr FINAL 022511.doc" deleted by Peter Ramanauskas/R5/USEPA/US]

NATE NEMANI, P.E.
RCRA CORRECTIVE ACTION PROJECT MANAGER

LAND AND CHEMICALS DIVISION
REMEDIATION AND REUSE BRANCH,
U. S.EPA, REGION 5 ,
77 W JACKSON Blvd, CHICAGO,ILLINOIS,60604, Mail Code: LU-9J
(312) 886-3224 (PHONE)
(312) 692-2176 (FAX)
nemani.nate@epa.gov (e-mail address)

LU-9J

Mr. Daniel McGrade
Director, Environmental,
SPX Corporation
13515 Ballantyne Corporate Place
Charlotte, North Carolina, 28277

RE: Approval for Risk-Based Remediation/ Cleanup and Disposal of PCB Contaminated Concrete at the SPX Lindberg Facility – 304 Hart Street, Watertown, Wisconsin

Dear Mr. McGrade:

The U.S. Environmental Protection Agency, Region 5 (EPA) has reviewed SPX Lindberg's Watertown, Wisconsin facility's (SPX), Risk Based Remediation Plan (Plan) dated August 11, 2010 and the subsequently revised plan of December 6, 2010 prepared and submitted by Delta Consultants of Shoreview, Minnesota, on behalf of SPX Corporation for the subject facility. The Plan is hereby approved with the attached conditions.

The Plan calls for a Risk Based Remediation/Clean-up and for the management of Polychlorinated Biphenyl (PCB) impacted concrete at SPX's subject manufacturing facility in Watertown, Wisconsin in accordance with EPA Toxic Substance Control Act (TSCA) PCB regulations 40 CFR 761.61(c). Specifically, the application asks for a Risk Based disposal approval for PCB Remediation waste. A Risk Based clean up level of ≤10mg/kg is proposed based on its Industrial use classification and limited accessibility.

Based on facility wide sampling it was determined that approximately 20,650 square feet of concrete contains PCB at concentrations greater than 10 mg/kg. The following remediation methods/plan-s ~~is~~ are being proposed for the facility to address the areas with PCB concentrations greater than 10 mg/kg:~~-~~

a) Bulk PCB Remediation Waste Removal and off-site disposal of a 700 square foot concrete pad in the rail spur loading area.
b) ~~Request for (i)~~ Continued Use Authorization ~~following~~ cleaning per ~~Subpart S and (ii) two coats of epoxy for in place management~~ §761.30(p) of 12,150 square feet of PCB contaminated bare concrete flooring.
c) ~~Request for~~ Continued Use Authorization ~~following~~ superficial cleaning and two coats of new epoxy for in place management of 7,000 square feet of PCB contaminated, previously epoxy coated concrete flooring.

d) Bulk PCB Remediation Waste Removal and off-site disposal of approximately 800 square feet of PCB contaminated concrete flooring located at eight non-contiguous locations each 10 feet by 10 feet.

This approval is granted in accordance with the federal PCB regulations codified at 40 CFR §761.61(c), under which the Regional Administrator may approve a risk-based disposal approval application, if it is found that the method will not pose an unreasonable risk of injury to human health or the environment. The Regional Administrator has redelegated this approval authority to the Director of Land and Chemicals Division. PCB remediation and clean-up activities will be conducted in accordance with the report dated August 11, 2010 and subsequently revised per the e-mail and its attachment dated December 6, 2010.

SPX is responsible for ensuring continued compliance with all applicable provisions of the Toxic Substances Control Act (TSCA), the federal PCB regulations and the Conditions of this approval, attached herewith. All conditions of this approval and other applicable requirements of TSCA and its regulations will continue to apply to the site after any transfer in ownership.

Please do not hesitate to call Nate Nemani, of my staff, at (312) 886-3224, if you have any questions regarding this approval.

Sincerely,

Bruce F. Sypniewski
Acting Director
Land and Chemicals Division

Enclosure

cc: Jeff Ackerman, Wisconsin Department of Natural Resources (WDNR)

APPROVAL CONDITIONS

A. Authorized Remedial Action

1. SPX is authorized to cleanup and dispose of PCB remediation waste at its facility in Watertown, Wisconsin facility located at 304 Hart Street (Site) according to the procedures described in the August 11, 2010 report titled Risk- Based Remediation Plan for PCB Contaminated Concrete and the subsequent revisions described in the December 6, 2010 email and Attachments. In addition, the following requirements need to be adhered to:

   a) **Bulk PCB Remediation Waste Removal and Disposal:**
   SPX will remove a 16 foot by 43 foot concrete pad located in the rail spur loading area. ~~The disposal of the material will be~~ at a TSCA permitted Landfill in accordance with regulations under 40 CFR §761.61(a)(5)(~~i~~)(B)(*2*). In addition to the rail spur loading area, eight (8) non-contiguous concrete sample locations will undergo similar removal and disposal. Given the limited area and vertical extent of PCBs in these eight locations, SPX will cut out and remove the entire thickness of a 10 foot by 10 foot concrete floor surrounding each sample location where the concentrations exceeded 10 mg/kg. The disposal of the material will be

   b) **Continued Use Authorization**:
   In accordance with requirements set forth in 40 CFR §761.30(p), porous surfaces contaminated by PCB will be managed with a target clean-up level of ≤10mg/kg and as per the procedures outlined in the December 6, 2010 e-mail.

   c) **Property Use and Restrictions and Notice:**
   Within 60 days of completion of the above approved removal activities in accordance with 40 CFR 761.61 (a) (8) (i), SPX will record, in accordance with state law, a notation to the deed for the Facility. A written certification indicating that the deed restriction has been filed will need to be submitted to the EPA Regional Administrator.

Formatted: Font: Italic

Comment [PR1]: Describe how this material will be properly disposed

Comment [PR2]: Should this be 'contaminated surfaces > 10 ppm'? Are all areas where wipe samples are > 10 ug/100 cm2 included for wash/rinse/epoxy coating?

Comment [PR3]: Better to say "Attachments to the email"?

Comment [PR4]: We should indicate that it needs to be an industrial use restriction. Maybe we should see a draft of the deed restriction?

Draft of the Deed Restrict

B. Inspection, Maintenance and Monitoring

Plans for the Long term management of the PCB affected concrete shall be put in place for implementation as needed. An Operations and Maintenance Plan shall be developed for minimizing human exposures. This shall include training of workers for inspecting the encapsulant for wear and damage, procedures for repairing the encapsulant as needed and a Safety plan for workers in case repair of the area is required. The management plan shall also include addressing the ultimate removal and disposal of PCB Contaminated concrete and soil remaining beneath the encapsulant in the event of building demolition or rennovation. Any

revised Section 3.0 "Clean-up Plan" of the "Risk-Based Remediation Plan" 8/11/10

concrete containing PCB at concentrations > 1 ppm must be disposed of per 40 §CFR 761.61. ~~for reconstruction of a different structure,~~

C. Change of Ownership

1. At least 45 days before conveying, in any manner, ownership or responsibility of the Facility or underlying property, SPX will notify EPA, Region 5, of its intent to convey such ownership or responsibility. Such notice will include the date of the intended conveyance, and the name, address, and phone number of the intended new owner or responsible person. If the conveyance is being made to a corporate entity, this notice will also include the name of a contact person.

2. At least 30 days before such conveyance, SPX will submit to EPA, Region 5, a notarized affidavit signed by the intended new owner or responsible person who states that such person will abide by the provisions of this Risk-Based Approval granted to SPX for this Facility.

D. Recordkeeping and Reporting

1. SPX will maintain all records and documents as required by 40 CFR Part 761.

2. SPX will submit a Closure Certification Report to EPA and WDNR within 90 days of completion of the activities described under this Approval. At a minimum, the report will include: a discussion of project activities, as-built specifications, sampling analytical results, copies of the accompanying analytical chains of custody, quality control/quality assurance checks, an estimate of the quantity of PCBs removed and disposed of off-site, and copies of manifests.

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
3911 Fish Hatchery Road
Fitchburg WI 53711-5397

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

October 26, 2016

Walter Galacki
Global Director, Environmental, Health & Safety
SPX Corporation
13320-A Ballantyne Corporate Place
Charlotte, North Carolina 28277

Subject: Review of Draft Documents for the Lindberg/MPH Facility Cleanup Case (aka SPX)
304 Hart Street and Neighboring Properties, Watertown, WI
DNR Case # 02-28-555133

Dear Mr. Galacki:

Thank you for having TRC send in the draft documents for the investigation and cleanup at the former Lindberg/MPH facility in Watertown, Wisconsin. The three draft documents include:

1. "Remediation Action Investigation & Design Report – SPX Corporation, Inc. – 304 Hart Street, Watertown, Wisconsin 53094 – September 2016"
2. "Remediation Action Investigation & Design Report for 1115, 1117, and 1129 South 3rd Street, Watertown, Wisconsin, 53904"
3. "Soils Management Plan for Remediation Actions Regarding PCB Contamination of Soils for the Liebhart Properties and the SPX Corporation Property in Watertown, Wisconsin – September 2016"

The concepts presented in the reports and plans appear reasonable, but you will need to provide additional information to assure that the final submittal(s) contain the necessary details and comply with the cleanup rules. Additional EPA involvement may also be necessary depending on the regulatory path you wish to pursue.

The extent of contamination must be more thoroughly evaluated to assure that there are no direct contact soil exceedences on the west side of South 3rd Street. TRC has not identified a source of the PCB contamination and one sample just east of 3rd Street (G-1) showed PCBs in excess of the residential direct contact standard. The additional sampling will assure that the PCB issue is fully addressed. Sampling prior to the excavation will also be useful in evaluating the effectiveness of dust control measures used during remedial excavations. If fugitive dust becomes an issue we may require additional soil sampling in the neighboring areas following the excavations.

We suggest that SPX consider doing public outreach prior to the remediation. The project has generated significant public interest and uncertainty sometimes heightens public concerns. Providing the public with information on the project could allay some of these concerns. The State and local health departments have expressed interest in doing public outreach for this case, and they could offer assistance.

The findings of PCBs above 50 parts per million means the site may also be regulated by the Environmental Protection Agency (EPA). If you wish for a "coordinated approval process", which allows Wisconsin to take the lead on the cleanup under the State's authority, you will need to make a request to the EPA in accordance with the requirements of 40 CFR761.77(1)(1). For additional information on the regulatory framework and your options, please review our guidance document RR-786, "PCB Remediation in Wisconsin Under the One Cleanup Program Memorandum of Understanding, November 2014" at http://dnr.wi.gov/files/pdf/pubs/rr/rr786.pdf .

The Wisconsin cleanup code requirements are contained within the NR 700 rule series of the Wisconsin Administrative Code. I understand that TRC is aware of these rules and has access to them. For your reference and as a matter of disclosure, the NR 700 code and other relevant cleanup rules, including the Spill Law (Wis. Stat. ch. 292), can be accessed at http://dnr.wi.gov/topic/brownfields/laws.html Several chapters and sections of the cleanup rules are referenced in this letter.

We view this case as one discharge site. As such, the investigation documentation should be submitted as one report. Parsing the data into two reports makes the information harder to understand and this type of presentation does not appear to be in compliance with the code requirements. TRC should create a comprehensive document that includes all of the site data and supporting documentation.

The final report and remediation plan must include the professional certification and sign-off(s) required under Wis. Adm. Code Ch. NR 712.

The data presentation needs to better explain the extent and distribution of the contaminants at the site. TRC should review the Wis. Adm. Code Ch. NR 716 requirements. Some examples of improvements that will aid in a better understanding of the site and the appropriateness of the proposed remedial action:

- A site map that meets the code requirements, and most notably shows the buried utilities.
- Geologic cross sections that show the fill, native soil type(s), and depth and extent of contamination.
- Soil data tables showing the sampling dates and specify the PCB arochlor and relevant standard(s).
- Isoconcentration maps that show the distribution of contamination, including the depths and concentrations detected at all samples, including the no detection results.
- The soil origins should be included on the test pit logs.

The remedial action plan documents do not meet the requirements of Wis. Adm. Code Ch. 724. Some examples:

- The information required under sec. 724.05 (2) (e) should be included.
- Calculations for the soil volumes should be shown and the results should be consistently referenced.
- Maps showing the proposed excavations super-imposed on the isoconcentration maps of soil contamination should be presented.
- Cross-sections showing the proposed excavations relative to the contamination should be presented.
- A better explanation of the soil confirmation sampling should be presented; depths, locations, and frequency relative to area or volume of excavation.
- Include a contingency plan for possible problems, such as water collecting in the excavation(s) or the possibility of a significant amount of fugitive dust.
- A contact for questions on the project should be included.
- The remedial action plan and soil management plan(s) should be stand-alone documents or they can be combined with the site investigation report. The reader should not need to reference figures contained in a separate document.

Some additional considerations for the final investigation plan and remedial action plans:

- Avoid storage of higher level (>50 ppm) PCB contaminated soil at the site, or provide justification as to why it should be temporarily stockpiled at the site.
- List "Arochlor 1260" as the contaminant rather than total PCBs, and note the default direct contact cleanup goals for Arochlor 1260 are 0.731 ppm industrial uses, and 0.216 ppm for non-industrial uses.
- The proposed soil volumes and areas of excavation should be consistent across the documents. For instance, compare the soil volumes in section 2.2 of the soil management plan with figure 5 of the site investigation report.

- The discussion for fill in the site investigation report at Hart street references "clean fill" for backfill, whereas the soil management plan includes re-use of impacted soil from the Liebhart properties.
- Was there any soil removed from beneath the building slab? If so, this should be documented in compliance with the Wis. Adm. Code ch. NR 724 requirements.
- A continuing obligation will be needed for the Hart Street location; the site will need to be kept in industrial use due to the higher cleanup standard.

Please have TRC submit the final investigation and remedial action plan document(s) at their earliest convenience. If you would like to discuss this letter please let me know.

Sincerely,

Jeff Ackerman
Hydrogeologist
(608) 275-3323
jeff.ackerman@wi.gov

cc: Dave McNichol, TRC-Connecticut
Rob Thibodeaux, Wisconsin DHS
Carol Quest, Watertown Dept of Public Health
William Liebhart

Nemani, Nate

From: Ackerman, Jeffrey A - DNR <Jeffrey.Ackerman@wisconsin.gov>
Sent: Friday, October 07, 2016 4:04 PM
To: Nemani, Nate; Ramanauskas, Peter
Cc: Edelstein, Gary A - DNR
Subject: SPX (aka Lindberg MPH) - Watertown, WI - PCBs > 50 ppm
Attachments: lindberg mph spx rp letter.pdf

Hi Nate and Peter,

We have talked about this site and I have shared data with you. Recently submitted reports show greater than 50 ppm PCBs in soil at the cleanup site to the west of the former building. The reports are available through our website at
http://dnr.wi.gov/botw/GetActivityDetail.do?adn=0228555133&siteId=1553200&crumb=1&search=b
If you need hard copies of these three documents, please contact Dave McNichol at TRC:

Dave McNichol
Senior Consultant
500 Bic Drive, Ste. 103, Milford, CT 06461
T: 203.876.1453 | F: 203.876.1486 | C: 203.856.8388
dmcnichol@trcsolutions.com

I can't find an initial (formal) notification to EPA and I want to close the loop on the DNR/EPA MOA requirements. Here is the information required in the notification form.

DNR Notification to EPA Form for PCB Contamination per OCP MOA

BRRTS #: 02-28-555133
Start Date: 2010-02-16
Site Name: Lindberg MPH
Site Address: 304 Hart St, Watertown
County: Jefferson County, Wisconsin
DNR PM Name: Jeff Ackerman
DNR PM Phone #: 608-275-3323
DNR PM Email: jeff.ackerman@wi.gov
PCB Site MOA Type if known (A, B or C – see guidance): possible change to Type C site
Impact (Soil, GW, etc. if received): soil

Per the form requirements, I am also attaching a copy of our March 2010 responsible party letter.

I will inform the responsible party and consultant that they will need to request the site go into the coordinated approval process, if that is their preferred regulatory route.

Please let me know if you have questions.

Jeff Ackerman
Hydrogeologist – Bureau for Remediation and Redevelopment/Environmental Management Division
Wisconsin Department of Natural Resources
3911 Fish Hatchery Road, Fitchburg, WI 53711
Phone: 608-275-3323
jeff.ackerman@wisconsin.gov


dnr.wi.gov


Nemani, Nate

From: McNichol, David <DMcNichol@trcsolutions.com>
Sent: Monday, April 11, 2016 10:07 AM
To: Nemani, Nate
Subject: FW: Requested Information
Attachments: 218588-006_Results.pdf; 218588-008_Proposed Borings.pdf; 2185880000PH2-001_01182016.xlsx

-----Original Message-----
From: McNichol, David
Sent: Wednesday, March 30, 2016 2:29 PM
To: Nemani, Nate <nemani.nate@epa.gov>
Cc: Galacki, Walter <walter.galacki@spx.com>
Subject: FW: Requested Information

Nate Hi

I have been meaning to share this with you for weeks. My apologies.

I thought that since I had updated Mr. Ackerman it would be a reasonable and good thing if I updated you also.

After you have had the opportunity to review this, please call if you would like to discuss.

At present we have done further work on SPX property, however, we've not been given access to complete further investigation of the Liebhart properties.

Best

Dave

Dave McNichol
Senior Consultant

500 Bic Drive, Ste. 103, Milford, CT 06461
T: 203.876.1453 | F: 203.876.1486 | C: 203.856.8388

dmcnichol@trcsolutions.com

-----Original Message-----
From: McNichol, David
Sent: Friday, February 12, 2016 4:07 PM
To: Ackerman, Jeffrey A - DNR <Jeffrey.Ackerman@wisconsin.gov>
Cc: Galacki, Walter <walter.galacki@spx.com>; Braun, Nathan <NBraun@trcsolutions.com>
Subject: Fw: Requested Information

Jeff Hi

The attached items are enough, I believe, to enable you to see the complete PCB picture for SPX and the abutting properties. You should also have received this week a Draft Remedial Action Completion report which includes the figure showing the sub-slab soil results associated with the building demo and remediation (all less than 0.74 mg/kg). Taken as a whole I believe you can evaluate just what information we have, shallow or at depth, and also understand what we are proposing to complete the delineation to WI residential soil stds.

Talk to you when I'm back the first week in March.

Best

Dave

From: Braun, Nathan
Sent: Friday, February 12, 2016 3:40 PM
To: McNichol, David
Subject: Requested Information

Your message is ready to be sent with the following file or link attachments:

218588-006_Results
218588-008_Proposed Borings
2185880000PH2-001_01182016

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Table 1
PCB Sample Results
SPX - Lindbergh/MPH
Watertown, Wisconsin

BORING ID	DEPTH RANGE (inches bgs)	TOTAL PCB (mg/kg)
B-1A	12-17	0.11
B-1B	55-60	ND
B-1C	0-6	**0.29**
B-2A	9-14	ND
B-2B	36	ND
B-2C	60	ND
B-3A	9-13	ND
B-3B	33-37	ND
B-4A	10-14	ND
B-4B	55-60	ND
B-5A	19-24	0.15
B-5B	55-60	ND
B-6A	24-29	ND
B-6B	55-60	ND
B-7A	19-24	ND
B-7B	55-60	ND
B-8A	19-24	ND
B-8B	55-60	ND
B-9A	20-24	ND
B-9B	55-60	ND
B-10A	19-24	**110**
B-10B	55-60	**96**
B-11A	16-21	ND
B-11B	55-60	ND
B-12A	9-14	**0.51**
B-12B	24-29	ND
B-12C	55-60	ND
B-13A	6-11	ND
B-13B	55-60	ND
B-14A	0-6	0.12
B-14B	55-60	ND
B-14C	115-120	ND
B-15A	6-11	ND
B-15B	55-60	ND
B-16A	0-6	**0.29**
B-16B	55-60	ND
B-16C	115-120	ND
B-17A	17-22	ND
B-17B	55-60	ND

BORING ID	DEPTH RANGE (inches bgs)	TOTAL PCB (mg/kg)
B-18A	0-6	**1.1**
B-18B	55-60	ND
B-19A	16-21	0.11
B-19B	55-60	ND
B-19C	115-120	ND
B-20A	12-17	ND
B-20B	55-60	ND
B-21A	6-11	**1.1**
B-21B	55-60	ND
B-22A	10-15	**0.68**
B-22B	55-60	ND
B-23A	10-15	0.11
B-23B	55-60	ND
B-24A	12-17	ND
B-24B	55-60	ND
B-25A	6-12	0.22[4]
B-25B	55-60	ND
B-25C	115-120	ND
B-26A	6-11	ND
B-26B	55-60	ND
B-27A	6-11	**0.61**
B-27B	55-60	ND
B-28A	12-17	**1.7**
B-28B	55-60	ND
B-29A	0-9	**14**
B-29B	55-60	ND
B-30A	8-13	**9.4**
B-30B	55-60	ND
B-31A	12-17	ND
B-31B	55-60	ND
B-32A	6-11	**1.5**
B-32B	55-60	ND
B-33A	6-11	0.19
B-33B	55-60	ND
B-34A	4-9	**0.23**
B-34B	55-60	ND
B-35A	4-9	**0.85**
B-35B	55-60	ND
B-36A	6-11	**3.9**

Notes:

1. Samples (TP & B-1 through B-33) collected on November 2 & 5, 2015, & B-34 through B-41 on 01/08/2016 by TRC, Inc.

2. ND = Non-detect - concentration below detection limit.

3. Bold & underlined results exceed the Wisconsin Residential Cleanup Standard of 0.221 mg/kg

4. Value equals the Wisconsin Residential Cleanup Standard.

Created by: A. Schroeder 11/15/2015, updated 1/18/16

Checked by: N. Braun 11/16/15

Table 1 - Continued
PCB Sample Results
SPX - Lindbergh/MPH
Watertown, Wisconsin

BORING ID	DEPTH RANGE (inches bgs)	TOTAL PCB (mg/kg)
B-36B	55-60	ND
B-37A	6-11	ND
B-37B	55-60	ND
B-38A	19-24	ND
B-38B	55-60	ND
B-38C	115-120	ND
B-39A	19-24	**1.5**
B-39B	55-60	**0.71**
B-39C	115-120	ND
B-40A	19-24	ND
B-40B	55-60	ND
B-40C	115-120	ND
B-41A	19-24	**39**
B-41B	55-60	**200**
B-41C	115-120	0.22[4]
1111 S. 3rd Street	3	0.19
TP-1	12 & 96	**34** & ND
TP-2	36 & 108	ND
TP-3	36 & 96	ND

Notes:

1. Samples (TP & B-1 through B-33) collected on November 2 & 5, 2015, & B-34 through B-41 on 01/08/2016 by TRC, Inc.
2. ND = Non-detect - concentration below detection limit.
3. Bold & underlined results exceed the Wisconsin Residential Cleanup Standard of 0.221 mg/kg
4. Value equals the Wisconsin Residential Cleanup Standard.

Created by: A. Schroeder 11/15/2015, updated 1/18/16
Checked by: N. Braun 11/16/15, updated 1/20/16

LEGEND

- PROPOSED GEOPROBE® SOIL BORING LOCATION
- PROPOSED GEOPROBE® SOIL BORING LOCATION - SAMPLE WILL BE HELD
- GEOPROBE® SOIL BORING

NOTES

1. BASE MAP IMAGERY FROM GOOGLE EARTH PRO & PARTNERS, 2014.
2. LABORATORY RESULTS ARE LOCATED ON TABLE 1 FOR THE TEST PITS AND GEOPROBE® BORINGS.
3. BORINGS B-1 THROUGH B-33 WERE COMPLETED ON 11/05/2015.
4. BORINGS B-34 THROUGH B-41 WERE COMPLETED ON 01/08/1991.
5. TEST PITS WERE COMPLETED ON 11/02/2015.

0 40 80 Feet

1 " = 40 '

1:480

DRAFT

PROJECT:

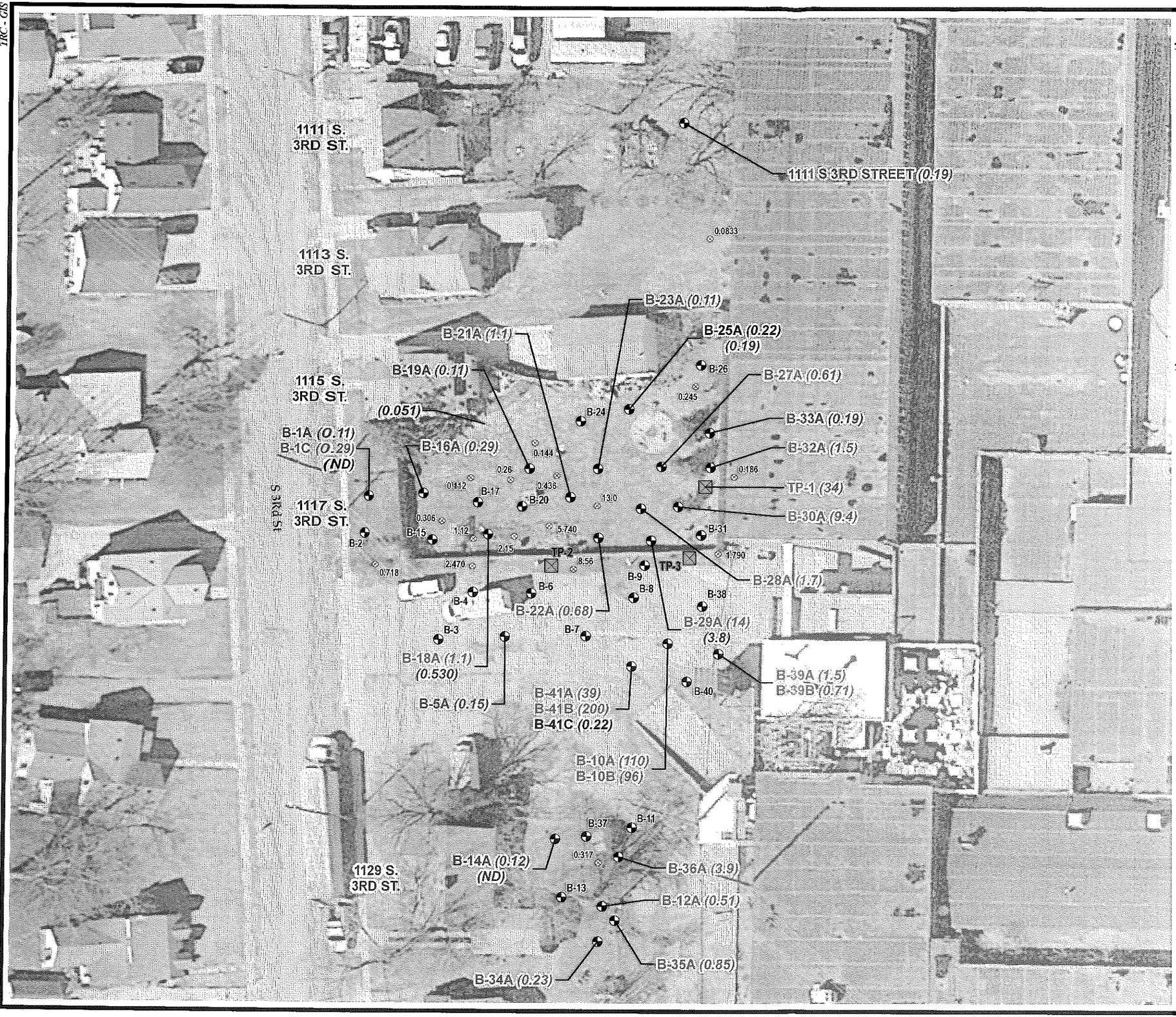
SPX - LINDBERGH/MPH
WATERTOWN, WISCONSIN

SHEET TITLE:

PROPOSED SOIL BORINGS

DRAWN BY: SUEMNICHT R	SCALE: 1: 480	PROJ. NO.	218558
CHECKED BY:		FILE NO.	218588-008.mxd
APPROVED BY:	DATE PRINTED:	**FIGURE 1**	
DATE: JANUARY 2016			

TRC
708 Heartland Trail, Suite 3000
Madison, WI 53717
Phone: 608.826.3600
www.trcsolutions.com



LEGEND

- 0.718 ⊗ — PREVIOUS PCB SOIL SAMPLE LOCATION & CONCENTRATION (mg/kg)
- ⊠ — TEST PIT LOCATION
- ◕ — GEOPROBE® SOIL BORING (YELLOW OUTLINED SOIL BORING ID DEPICTS A NON-DETECT RESULT)
- **B-1A** *(0.11)* — SAMPLE RESULTS DO NOT EXCEED THE RESIDENTIAL CLEANUP STANDARD OF 0.221 mg/kg
- **B-10A** *(110)* — SAMPLE RESULTS EXCEED THE RESIDENTIAL CLEANUP STANDARD OF 0.221 mg/kg
- **B-10A** *(0.22)* — SAMPLE RESULTS EQUAL THE RESIDENTIAL CLEANUP STANDARD OF 0.221 mg/kg
- *(0.19)* — SAMPLE COLLECTED BY MARK KNIGHT, CONSULTANT FOR MR. LIEBHART

NOTES

1. BASE MAP IMAGERY FROM GOOGLE EARTH PRO & PARTNERS, 2014.
2. LABORATORY RESULTS ARE LOCATED ON TABLE 1 FOR THE TEST PITS AND GEOPROBE® BORINGS.
3. BORINGS B-1 THROUGH B-33 WERE COMPLETED ON 11/05/2015.
4. BORINGS B-34 THROUGH B-41 WERE COMPLETED ON 01/08/2016.
5. TEST PITS WERE COMPLETED ON 11/02/2015.

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DRAFT

PROJECT:
SPX - LINDBERGH/MPH
WATERTOWN, WISCONSIN

SHEET TITLE:
SOIL BORING & SAMPLE LOCATION RESULTS

DRAWN BY: SUEMNICHT R	SCALE: 1: 480	PROJ. NO.	218558
CHECKED BY:		FILE NO.	218588-006.mxd
APPROVED BY:	DATE PRINTED:	**FIGURE 2**	
DATE: JANUARY 2016			

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Madison, WI 53717
Phone: 608.826.3600
www.trcsolutions.com

Saved By: RSUEMNICHT on 1/19/2016, 09:07:45 AM
Path: E:\SPX\Watertown\Wl2015_218588\218588-006.mxd
Coordinate System: NAD 1983 StatePlane Wisconsin South FIPS 4803 Feet (Foot US)
Map Rotation: 0
TRC - GIS

Nemani, Nate

From: Ackerman, Jeffrey A - DNR <Jeffrey.Ackerman@wisconsin.gov>
Sent: Friday, January 29, 2016 2:15 PM
To: Nemani, Nate
Cc: Edelstein, Gary A - DNR
Subject: FW: SPX Watertown
Attachments: SPX BoringsfigJan20results218588-006 (005).pdf; SPX BoringsfigJan20218588-008 (003).pdf; 20160129135632914.pdf

Hi Nate,
Here is the latest for SPX (what we call Lindberg/MPH in our database). We don't have a report yet and these results are draft.
I am also including our notification form to close the loop on that.
Let me know when you would like to talk. Next week my schedule is open Tuesday and Wednesday and in the afternoon of Thursday and Friday.
Jeff

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Jeff Ackerman
608-275-3323
jeff.ackerman@wisconsin.gov

From: McNichol, David [mailto:DMcNichol@trcsolutions.com]
Sent: Thursday, January 21, 2016 10:31 AM
To: Ackerman, Jeffrey A - DNR
Subject: SPX Watertown

Jeff Hi

I will try to call you a little later to discuss the attached. Note that these are draft and as such for discussion only until data is validated and GPS data confirmed.

Thanks

Best
Dave

Dave McNichol
Senior Consultant

TRC
Results You Can Rely On

500 Bic Drive, Ste. 103, Milford, CT 06461
T: 203.876.1453 | F: 203.876.1486 | C: 203.856.8388

dmcnichol@trcsolutions.com

Notice #1 – DNR Notification to EPA Form for PCB Contamination per OCP MOA

For notification of EPA new discovered PCB sites entered onto BRRTS. EPA will also track these cases. DNR agrees to provide the following in electronic form:

BRRTS#	02-28-555133
Start Date	02/16/2010
Site Name	LINDBERG/MPH FACILITY
Site Address	304 HART ST, Watertown, WI
County	Jefferson
DNR PM Name	Jeff Ackerman
DNR PM Phone#	(608) 275-3323
PCB Site MOA Type	Uncertain
Impact	Soil

DNR will identify PCBs as being a substance type in BRRTS for these sites.

A copy of DNR's RP notification letter should be converted to a pdf file and accompany this form.

Upon completion of this form by DNR, please email this form and a pdf of the RP letter to the EPA Region 5 PCB coordinator with an email cc to the DNR RR Bureau PCB Contact.

Add BRRTS Action Code 99 with the date and comment stating "OCP PCB Notice #1, Notification of a PCB Contamination Site sent to EPA"

Upon receipt of the form by EPA, EPA will assign a Region 5 contact to the case and notify the DNR PM and the DNR RR Bureau PCB contact. The DNR PM should enter the name of the EPA contact into BRRTS for the site.

LEGEND

- PROPOSED GEOPROBE® SOIL BORING LOCATION
- GEOPROBE® SOIL BORING

NOTES

1. BASE MAP IMAGERY FROM GOOGLE EARTH PRO & PARTNERS, 2014.
2. LABORATORY RESULTS ARE LOCATED ON TABLE 1 FOR THE TEST PITS AND GEOPROBE® BORINGS.
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5. TEST PITS WERE COMPLETED ON 11/02/2015.

0 40 80 Feet

1 " = 40 '
1:480

DRAFT

PROJECT:
SPX - LINDBERGH/MPH
WATERTOWN, WISCONSIN

SHEET TITLE:
PROPOSED SOIL BORINGS

DRAWN BY: SUEMNICHT R	SCALE: 1: 480	PROJ. NO.	218558
CHECKED BY:		FILE NO.	218588-008.mxd
APPROVED BY:	DATE PRINTED:	**FIGURE 1**	
DATE: JANUARY 2016			

TRC
708 Heartland Trail, Suite 3000
Madison, WI 53717
Phone: 608.826.3600
www.trcsolutions.com

TRC - GIS
Coordinate System: NAD 1983 StatePlane Wisconsin South FIPS 4803 Feet (Foot US)
Map Rotation: 0
Saved By: RSUEMNICHT on 1/20/2016, 09:01:55 AM
Path: E:\SPX\Watertown\WI\2015_218588\218588-008.mxd

Task Details

Request Status : *Assignment Determination* **Task Due Date :** *08/10/2015*

Submitted — Evaluation — Assignment — Processing — Closed

Request Details

Tracking Number : EPA-R5-2015-008913
Requester : Mr. Carey S. Rosemarin
Organization : Law Offices of Carey S. Rosemarin, P.C.
Requester Has Account : Yes
Email Address : csr@rosemarinlaw.com
Phone Number : 847-897-8000
Fax Number : 312-896-5786
Address : 500 Skokie Blvd. Suite 510
City : Northbrook
State/Province : IL
Zip Code/Postal Code : 60062

Submitted Date : 07/10/2015
Perfected Date : 07/13/2015
Last Assigned Date : 07/13/2015
Fee Limit : $25.00
Request Track : Simple
Due Date : 08/10/2015
Assigned To : Jessica Wheatley (Region 5)
Last Assigned By : Joseph Winfrey (Region 5)

RCRAInfo - Y
ICIS - Y
~~2004~~ Indexed

LCD and SFD

Task Details

Task Type : Request Detail
Due Date : 08/10/2015
Task Submitted Date : 07/13/2015

Assigned To : La Nita Marrable (Land and Chemicals Division)
Last Assigned Date : 07/14/2015
Last Assigned By : Terri Wilson (Land and Chemicals Division)

Description : All records relating to the site located at 304 Hart Street in Watertown, Wisconsin 53094 (the "Site").
Comments :

Submission Details | Case File | Admin Cost | Assigned Tasks | Comments (1) | Review

Request Handling

Requester Info Available to the Public : Yes
Request Track : Simple
Fee Category : Commercial
Fee Waiver Requested: No
Fee Waiver Status: N/A
Expedited Processing Requested : No
Expedited Processing Status : N/A

Request Perfected : Yes
Perfected Date : 07/13/2015
Acknowledgement Sent Date:
Unusual Circumstances ? No

Request Description

WIT 560 011 942

Short Description : All records relating to the site located at 304 Hart Street in Watertown, Wisconsin 53094 (the "Site").

Please produce all records relating to the site located at 304 Hart Street in Watertown, Wisconsin 53094 (the "Site"). The records requested include, but are not limited to, all environmental investigations, complaints and demolition activities relating to the Site. It is believed that the Site is currently owned and/or operated by SPX Corporation, and was formerly owned and/or operated by Lindberg/Blue M Electric Company. My request is limited to the period from January 1, 2013 through the present. If you have any questions concerning this request, or if I can assist in facilitating a response by narrowing the request, or otherwise, please call me at 847-897-8000 x11. Thank you for your assistance.
Carey S. Rosemarin

No record per Susan Friedman

SPX

Writers Direct Dial: 704-808-3751
Writers Direct Fax: 704-752-4578
E-Mail Address: walter.galacki@spx.com

December 22, 2014

USEPA
Region 5
TSCA/PCB Coordinator
77 West Jackson Boulevard
Chicago, IL 60604-3590
Attn: Nate Nemani, L-8J

Re: SPX Corporation former Lindberg Facility
304 Hart Street
Watertown, WI 53094
Revised Report and Cleanup Plan

Gentlemen:

As recently discussed between TRC, SPX's environmental consultant, and USEPA's Nate Nemani, SPX is submitting this revised information to notify and certify to the Agency and all concerned (the EPA Regional Administrator, the Secretary of the WI DNR, Jefferson County, and the City of Watertown) that SPX intends to conduct a "self-implementing on-site cleanup and disposal of PCB remediation waste" for the captioned site.

SPX had previously received EPA's approval for a partial removal of PCB surficially contaminated concrete flooring and encapsulation of other flooring (40 CFR 761.61 (c)) dated 28 March 2011. As discussed, based on the deteriorating condition of the building and in consultation with the City, SPX has decided to demolish the building and all associated structures and completely remediate the facility in accord with 40 CFR 761.61 (a)(3).

Enclosed is documentation covering the nature of the PCB contamination, the summary of procedures and methods for sampling, characterization and analysis, the location and extent of the contamination, and a cleanup plan including schedule, disposal plan and the demolition and remedial approach.

SPX CORPORATION
13320 BALLANTYNE CORPORATE PLACE
CHARLOTTE, NC 28277-2708
UNITED STATES OF AMERICA

www.spx.com

Since we believed that we were close to an EPA approval some time ago, we are asking for an expedited review of this material in order that our demolition and remediation contractor may continue with his work at the site. Should you need any further information please contact our consultant, Dave McNichol of TRC immediately.

Thank you in advance for your attention to this matter.

Very truly yours,

Walter Galacki
Director Environmental
For SPX Corporation, Owner and Operator and Successor in Interest of the former SPX Lindberg site

W/enclosures

CC: Jefferson County Health Department, Environmental Health Section
WI DNR, Remediation and Redevelopment Program
City of Watertown, J.J. Holloway, PE
TRC, Dave McNichol
Nixon Peabody, Al Floro

SELF-IMPLEMENTING ON-SITE CLEANUP AND DISPOSAL OF PCB REMEDIATION WASTE

November 2014
REVISED December 19, 2014

SPX LINDBERG FACILITY,
304 Hart Street, Watertown, WI

TRC Project No.: 218588-0000-0000

SPX Corporation
13320 Ballantyne Corporate Place
Charlotte, NC 28277-2706

Prepared By:

500 Bic Drive, Suite 103
Milford, Connecticut 06461
Telephone: 203-876-1453
Facsimile: 203-876-1406

www.trcsolutions.com

TABLE OF CONTENTS

1.0 INTRODUCTION

1.1 PURPOSE

SPX Corporation (SPX) wishes to perform under 40 CFR 761.61 (a) (3) a *Self-implementing on-site cleanup and disposal of PCB remediation waste* at the SPX Lindberg facility located at 304 Hart Street, Watertown, WI 53094. The entire project also involves the complete demolition and remediation of the facility. SPX had received EPA's approval for a risk-based approach under 40 CFR 761.61(c). See EPA letter dated March 28, 2011.

SPX, however, no longer believes the facility is useful in its' deteriorated condition and now wishes to completely demolish the buildings and remediate the site and seeks, with the help of the City of Watertown, to find a redeveloper. Thus, SPX is seeking EPA's approval under 40 CFR 761.61(a)(3) in order to perform a *Self-implementing on-site cleanup and disposal of PCB remediation waste.*

1.2 BACKGROUND

Delta Consultants, Shoreview, MN has investigated the Lindberg facility for PCBs and has reported on those investigations. EPA's prior approval (March 28, 2011) was based upon that reporting. TRC has been engaged by SPX to manage/oversee the remediation and demolition. As such TRC and SPX are continuing to rely upon Delta's earlier work and their report "Risk-Based Remediation Plan for PCB-Contaminated Concrete" dated August 2, 2010 and (the subsequent modifications and revisions through December 6, 2010) it is incorporated herein. For the reader's convenience and reference the material follows this report.

The PCB contamination observed at the former Lindberg facility is believed to have been from the manufacture of electrical transformers during a period from 1953 until 1971. No spill event nor history has been identified through a historical review as well as interviews with former employees. The primary PCB contamination is of concrete flooring (within the building) and to a lesser extent a small area outside the building which is a small loading/shipping pad and adjacent soils. Notably, the PCB contamination is not at depth in the concrete flooring, thus PCB contamination is not expected in the substrate beneath any flooring. See especially the Figures in the Delta Report.

SPX, in conjunction with the facilities full demolition and remediation, will remove all Asbestos Containing Building Materials (ACM), Universal Waste (batteries, lamps-both florescent and metal-halide, mercury in electrical components, CPUs, etc.), decommission all firewater, electric, gas, water and sewer, remove all oils, lubes, etc. For the demolition all C & D waste will be disposed at the local Subtitle D (Solid Waste) landfill operated by Waste Management and located in Watertown. The ACM is to be transported and disposed at the Pheasant Run Landfill operated by Waste Management and located in Bristol, WI. Universal waste is destined for Mercury Waste Solutions in Union Grove, WI. And, the PCB concrete along with a minor amount of soil (loading pad area) would be manifested and

transported to a Subtitle C (Hazardous Waste) Landfill operated by Heritage Environmental Services located in Roachdale, IN.

2.0 NATURE OF PCB CONTAMINATION

The nature of the contamination is fully described and explained by Delta in their report. The sampling, the analysis, the PCB results and the graphic (figures) pattern of PCB contamination is all contained in Section 2 of their report. SPX and TRC are relying on this information for the Cleanup discussion which follows in Section 3. Please see Section 2 of the Delta report for a description of the nature of the contamination.

3.0 CLEAN UP PLAN

The SPX former Lindberg facility had been principally, over its long history, a manufacturer of industrial ovens, furnaces, and environmental test chambers with an associated business office activity. Early in its history the facility had also produced electrical transformers. The PCB contamination at the facility results from its manufacture of electrical transformers. The manufacturing areas were in some cases added buildings and in other cases large rooms or other functional areas within a given building-see figures. SPX will perform a self-implementing clean up resulting in PCB concentrations for the site of less than 0.74 mg/kg. This will allow unlimited use for the remaining land under EPA criteria after all remediation and demolition are completed [40 CFR 761.61(a)(4)(i)(A)]. The site, since it will be cleaned up to less than 0.74 mg/kg PCBs, will only be eligible for unlimited commercial or industrial use (**not residential**) under Wisconsin criteria. Thus the sites future use can only be commercial or industrial. A Deed Notice will be entered recording this environmental land use restriction. The proposed clean up includes the removal of PCB contaminated concrete, the removal of a minor quantity of PCB contaminated soils and a loading pad (only outdoor area), and the transportation and disposal of these materials to a RCRA Subtitle C facility all as more fully described below.

3.1 Bulk PCB Remediation Waste Removal and Disposal

SPX intends to remove all of the concrete flooring shown on Figure 1 as PCB remediation waste. The five areas shown on the Figure will completely and conservatively remove and dispose of any concrete flooring with a PCB concentration of 50 mg/kg or above. The contractor hired by SPX, Apollo Dismantling, has mobilized to the site and is currently preparing for the demolition and remediation. At the moment Apollo and its subcontractors are removing all ACM, removing all Universal wastes, collecting all lamps and ballasts, and draining and arranging for utility shutoffs and blocks. Once this work is completed Apollo had planned to cut out and remove all of the PCB concrete for Title C Landfill disposal. See schedule below.

The concrete removal will be in all cases to full floor depth. In addition, SPX proposes to remove to the next core location (still locatable) where a measured result is less than 50 mg/kg content. Thus existing measured values and full depth floor removal ensures the cleanup objective is met. The removed flooring will then be manifested, transported and disposed at the Subtitle C landfill operated by Heritage Environmental Services located in Roachdale, Indiana.

Remaining flooring will then be removed from all areas (rooms and/or buildings). The material will be sized and placed in a single on site pile for further use on site, if possible. Prior to any on-site use the pile will be sampled and analyzed to ensure that the material is less than 0.74 mg/kg PCB content. If less than, the material is candidate material for onsite use to fill any basement voids and grade the site after the demolition. Should the any pile material test greater than 0.74 mg/kg it will not be used onsite but will be disposed into a Subtitle D landfill, either for temporary cover or as fill. Thus any PCB concrete

greater than 50 mg/kg (and minor soils quantity) will be disposed at a Subtitle C (Hazardous Waste) facility; any PCB concrete greater than 0.74 mg/kg will be disposed in a Subtitle D (Solid Waste) landfill facility; and, any PCB concrete less than 0.74 mg/kg may be retained for use to fill basement voids onsite and grading-or if an excessive quantity exists, may also be disposed in the same Subtitle D landfill facility.

3.2 SCHEDULE

The schedule is as follows:

ACM removal, 24 Oct-23 Dec/14
PCB remediation waste removal, 15 Jan-28 Feb/15
Lights/ballasts/U waste, 17 Nov-15 Dec/14
Demolition, 5 Jan-28 Feb/15
Site Restoration, Mar-Apr/15

3.3 Verification

Verification sampling will be performed under all five PCB remediation waste removal areas. See Figure 2 for proposed sample locations. ASTM Method D2974 will be used for moisture content and EPA Method 8082 will be used for sample analysis. Reporting will be for the seven congeners required by WI DNR and total PCB. The outdoor excavation will be sampled with 2-sidewalls samples and a bottom invert sample. Any concrete pile proposed for onsite reuse (filling and grading) will be sampled with 6 samples, composited to 2 for analysis.

3.4 Site Restoration

After completion of all the demolition and remediation activities the site will be restored. The front side walk on Hart Street will remain. The voids of former basement areas will be filled with the concrete from the less than 0.74 mg/kg pile (assuming it has been verified as described herein). After the voids are filled fresh stone will be imported to cover the graded concrete areas. The site will be somewhat crowned to allow that no ponding should occur over time. The property will then be idle until redevelopment can be planned and implemented.

4.0 Deed Notice

SPX Corporation will prepare and have entered a Deed Notice which will limit the property uses to commercial and/or industrial only. The use of the property for residential purposes will be prohibited. Full-time commercial or industrial uses will be allowed since the clean up to less than 0.74 mg/kg PCBs meet the criteria for both EPA and WI DNR.

5.0 Certification

SPX Corporation as the Owner and Operator and Successor in Interest of the former SPX Lindberg site hereby certifies and notifies that the site located at:

304 Hart Street, City of Watertown, County of Jefferson, Wisconsin (The former Lindberg facility)

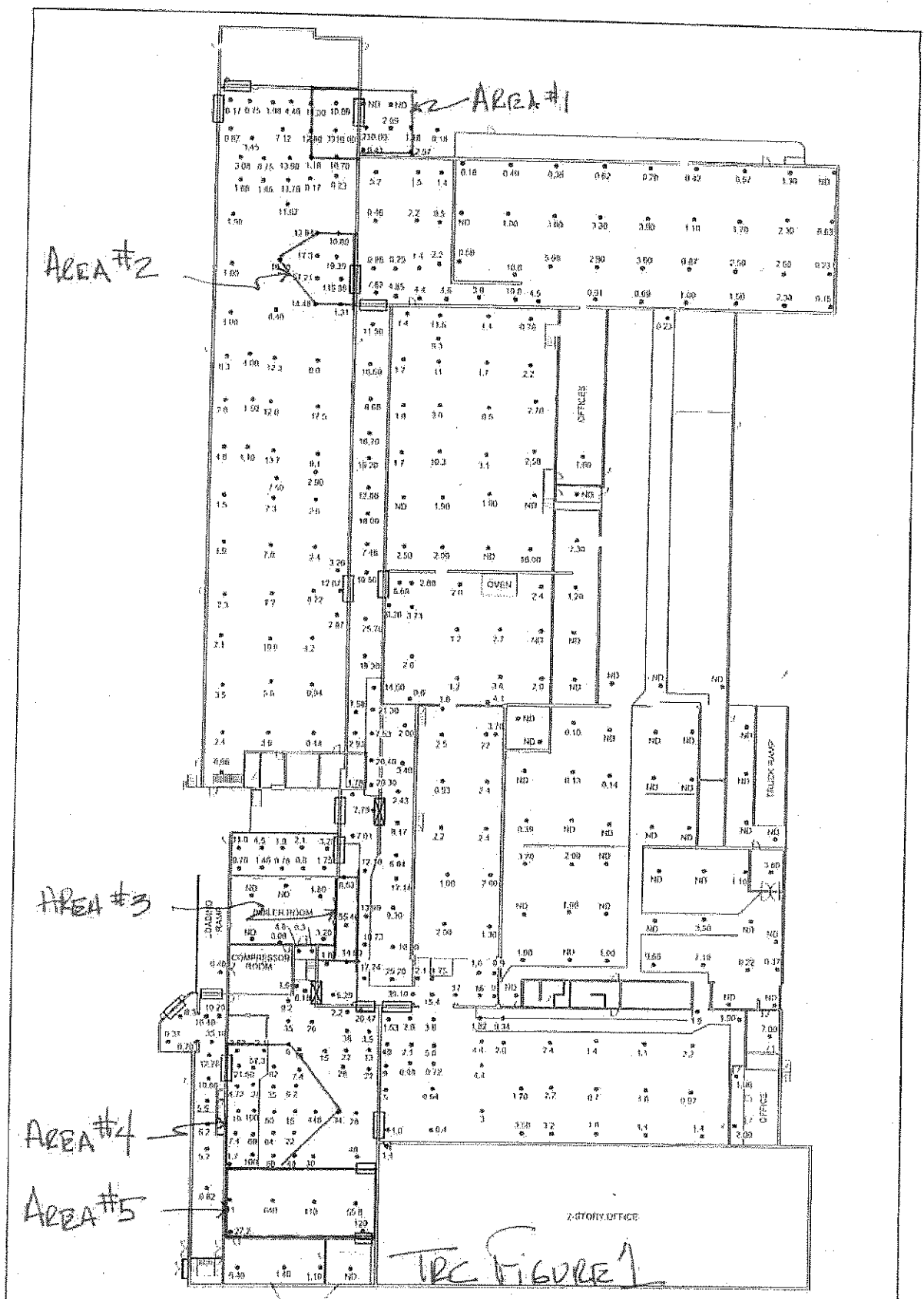
(SPX) is proposing a "self-implementing on-site cleanup and disposal of PCB remediation waste", and as such SPX has engaged Apollo Dismantling Services, LLC of Niagara Falls, NY to perform the remediation and proper disposal of the site PCB remediation waste, further

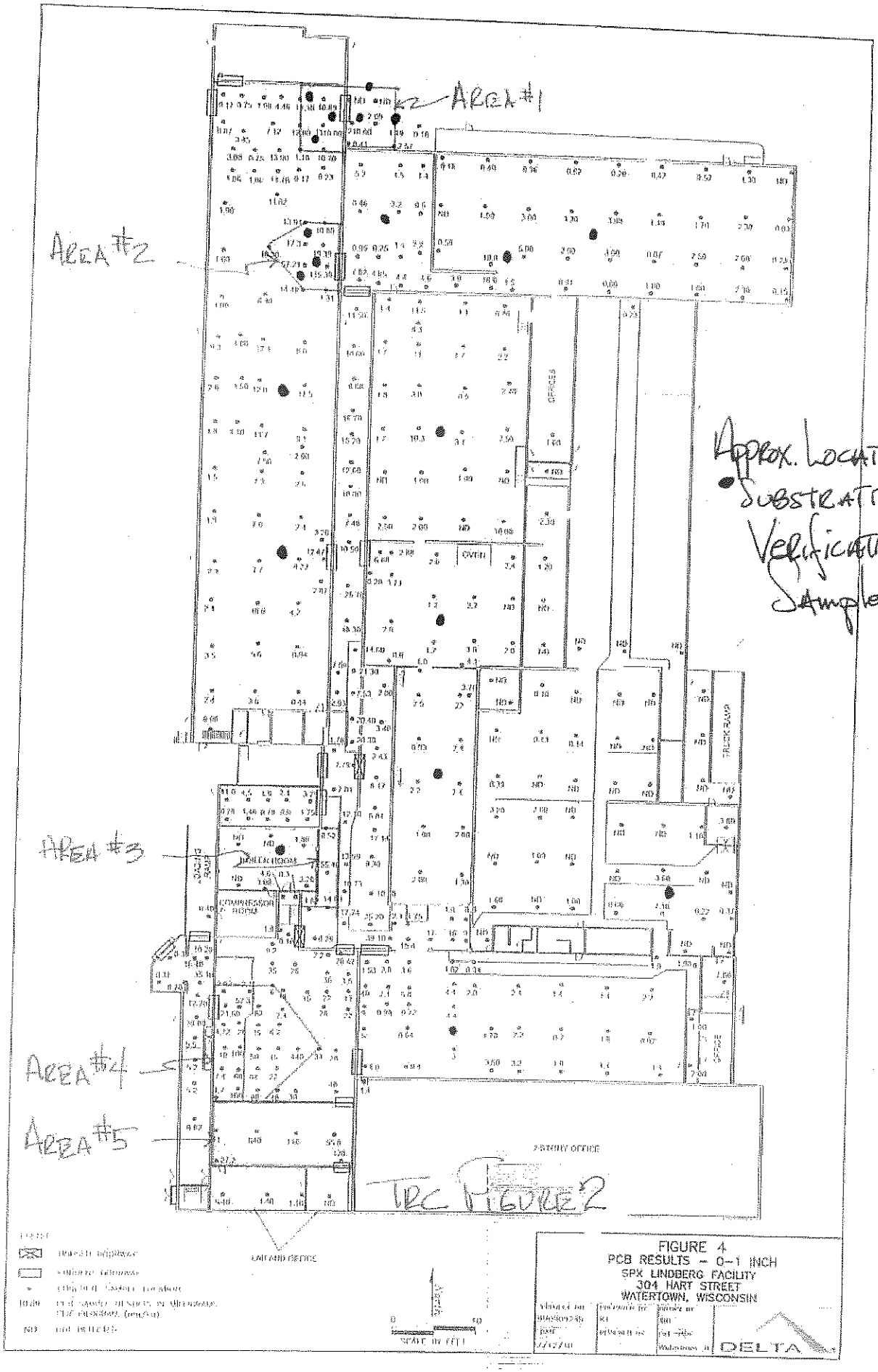
a complete package of all PCB sampling, analysis, results, maps, and other PCB related documents will be available on site for EPA's inspection anytime throughout the duration of the project. All information will be available electronically in the Apollo field construction trailer located at the site.

6.0 RECORDKEEPING

A file containing all sampling, analysis, results, graphic depictions of results, shipping and manifesting documents including weight tickets and summaries will be created. Several electronic copies of the record compilation will be made. An electronic copy will be forwarded to USEPA Region 5 PCB Coordinator and to WI DNR PCB Section.

Since this is a cleanup to less than 0.74 mg/kg PCB no further environmental actions are anticipated under 40 CFR 761.61.


AREA #1
AREA #2
AREA #3
AREA #4
AREA #5
OFFICES
OVEN
TRUCK RAMP
LOADING RAMP
BOILER ROOM
COMPRESSOR ROOM
OFFICE
2-STORY OFFICE
LAB AND OFFICE
TRC FIGURE 1
SCALE IN FEET
FIGURE 4
PCB RESULTS - 0-1 INCH
SPX LINDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN
DELTA


AREA #1
AREA #2
AREA #3
AREA #4
AREA #5
Approx. Location Substrate Verification Samples
OVEN
TRUCK RAMP
COMPRESSOR ROOM
2-STORY OFFICE
EAST WING OFFICE
TRC FIGURE 2
FIGURE 4
PCB RESULTS - 0-1 INCH
SPX LINDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN
DELTA

Report & Documents – Same As Now 2014
Hereinafter

Waste Management Plan

November 2014

SPX - Lindberg
304 Hart Street
Watertown, WI 53094

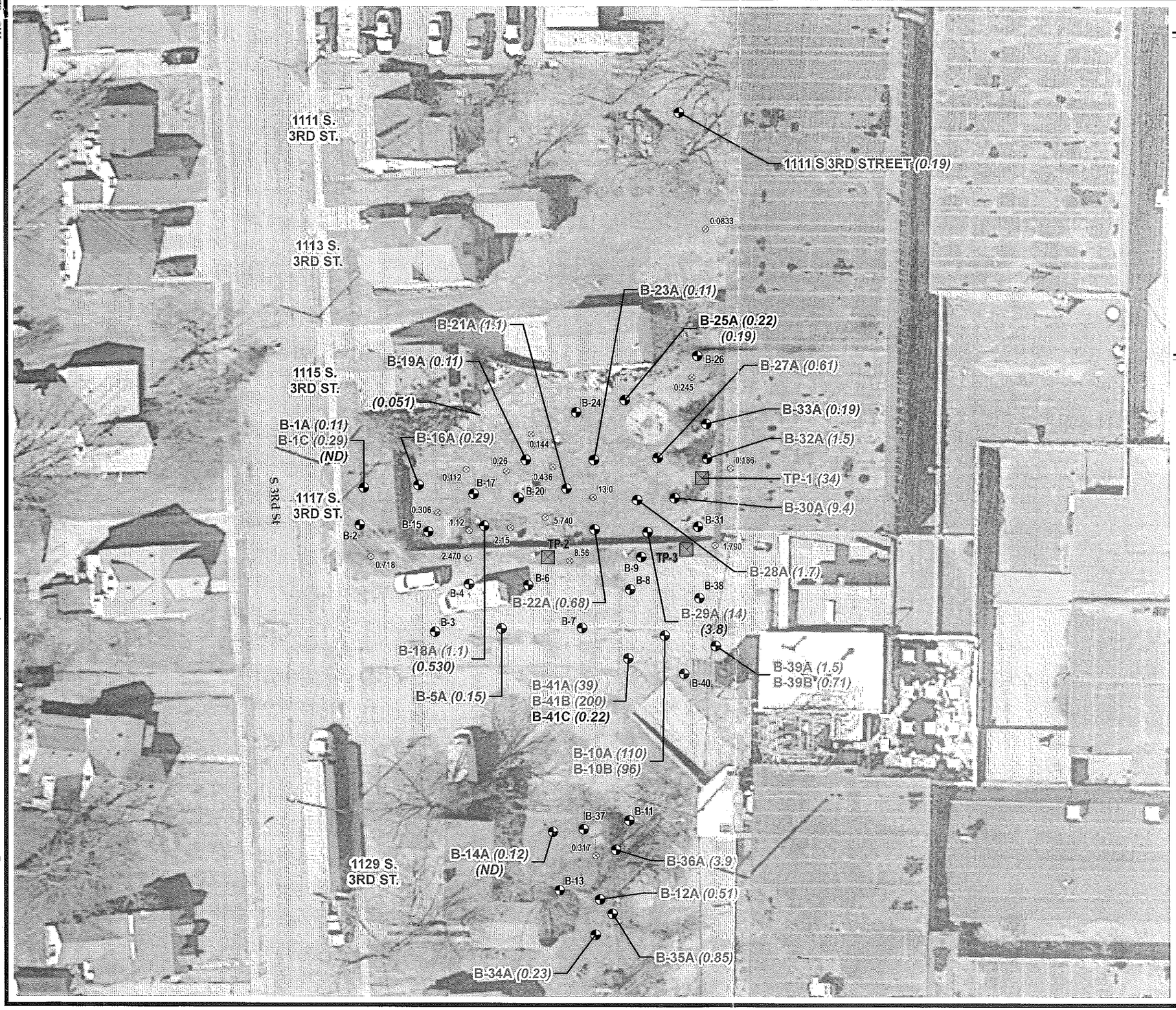
Prepared for:

SPX

13320 Ballantyne Corporate Place
Charlotte, NC 28277

Prepared by:

APOLLO DISMANTLING
4511 Hyde Park Blvd.
2nd Floor
Niagara Falls, NY 14305



LEGEND

- 0.718 — PREVIOUS PCB SOIL SAMPLE LOCATION & CONCENTRATION (mg/kg)
- TEST PIT LOCATION
- GEOPROBE® SOIL BORING (YELLOW OUTLINED SOIL BORING ID DEPICTS A NON-DETECT RESULT)
- **B-1A *(0.11)*** — SAMPLE RESULTS DO NOT EXCEED THE RESIDENTIAL CLEANUP STANDARD OF 0.221 mg/kg
- **B-10A *(110)*** — SAMPLE RESULTS EXCEED THE RESIDENTIAL CLEANUP STANDARD OF 0.221 mg/kg
- **B-10A *(0.22)*** — SAMPLE RESULTS EQUAL THE RESIDENTIAL CLEANUP STANDARD OF 0.221 mg/kg
- ***(0.19)*** — SAMPLE COLLECTED BY MARK KNIGHT, CONSULTANT FOR MR. LIEBHART

NOTES

1. BASE MAP IMAGERY FROM GOOGLE EARTH PRO & PARTNERS, 2014.
2. LABORATORY RESULTS ARE LOCATED ON TABLE 1 FOR THE TEST PITS AND GEOPROBE® BORINGS.
3. BORINGS B-1 THROUGH B-33 WERE COMPLETED ON 11/05/2015.
4. BORINGS B-34 THROUGH B-41 WERE COMPLETED ON 01/08/2016.
5. TEST PITS WERE COMPLETED ON 11/02/2015.

N

0 40 80 Feet

1 " = 40 '
1:480

DRAFT

PROJECT:
SPX - LINDBERGH/MPH
WATERTOWN, WISCONSIN

SHEET TITLE:
SOIL BORING & SAMPLE LOCATION RESULTS

DRAWN BY: SUEMNICHT R	SCALE: 1: 480	PROJ. NO.	218558
CHECKED BY:		FILE NO.	218588-006.mxd
APPROVED BY:	DATE PRINTED:	**FIGURE 2**	
DATE: JANUARY 2016			

TRC
708 Heartland Trail, Suite 3000
Madison, WI 53717
Phone: 608.826.3600
www.trcsolutions.com

Saved By: RSUEMNICHT on 1/19/2016, 09:07:45 AM
Path: E:\SPX\Watertown\WI\2015_218588\218588-006.mxd
Coordinate System: NAD 1983 StatePlane Wisconsin South FIPS 4803 Feet (Foot US)
Map Rotation: 0
TRC GIS

Nemani, Nate

From: Schmoller, Michael R - DNR <Michael.Schmoller@wisconsin.gov>
Sent: Tuesday, November 25, 2014 3:29 PM
To: Nemani, Nate
Subject: FW: SPX, Hart Street, Watertown

fyi

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

R. Michael Schmoller
Phone: 608-275-3303
Michael.schmoller@wisconsin.gov

From: Schmoller, Michael R - DNR
Sent: Tuesday, November 25, 2014 3:28 PM
To: 'dmcnichol@trcsolutions.com'; Hanefeld, Linda S - DNR
Cc: 'walter.galacki@spx.com'
Subject: SPX, Hart Street, Watertown

Dave
I have looked at the demolition and waste management proposal for this property. For the most part the proposal seems acceptable. There are two concerns. These are:

If contaminated material is placed back on site as fill, those areas will be may need capping or further remedial measures. In Wisconsin the direct contact criteria for PCBs is .22 ppm for residential areas and .74 ppm in commercial and industrial sites. As proposed it is possible some fill material may exceed these criteria.

As proposed there is no provision for subslab soil sampling based on the apparent lack of migration of PCBs through the concrete. Our experience shows us that in an industrial setting where PCBs were handled for nearly 20 years there is often soil contamination as a result of movement through floor cracks, etc. To comply with state requirements and meet our closure criteria subslab soils sampling will be necessary.

Please contact me about these issues as soon as possible.

Mike

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

R. Michael Schmoller
Hydrogeologist
Wisconsin Department of Natural Resources
Phone: 608-275-3303
Cell Phone: 608-576-0183
Michael.schmoller@wisconsin.gov

Nemani, Nate

From: McNichol, David <DMcNichol@trcsolutions.com>
Sent: Wednesday, November 19, 2014 4:14 PM
To: Nemani, Nate
Cc: Galacki, Walter
Subject: SPX Watertown Notification and Certification for self-implementing on-site cleanup.....
Attachments: TRC USEPA Submit SPX Watertown 11-19-14.pdf

Dear Mr. Nemani:

Attached is a submission containing, we believe, everything you may need to review and approve this PCB activity under 40 CFR 761.61 (a).

Please contact me immediately should you have any questions or require any additional information. Copies are also being distributed to appropriate parties at WI DNR, Jefferson County and the City of Watertown.

We look forward to your response.

Best

Dave McNichol
Senior Consultant

500 Bic Drive, Ste. 103, Milford, CT 06461
T: 203.876.1453 | F: 203.876.1486 | C: 203.856.8388

dmcnichol@trcsolutions.com

SPX

Writers Direct Dial: 704-808-3751
Writers Direct Fax: 704-752-4578
E-Mail Address: walter.galacki@spx.com

November 19, 2014

USEPA
Region 5
TSCA/PCB Coordinator
77 West Jackson Boulevard
Chicago, IL 60604-3590
Attn: N. Nemani, L-8J

LU-9J

Re: SPX Corporation former Lindberg Facility
304 Hart Street
Watertown, WI 53094

Gentlemen:

As recently discussed between TRC, SPX's environmental consultant, and USEPA's Nathan Nemani, SPX is submitting this information to notify and certify to the Agency and all concerned (the EPA Regional Administrator, the Secretary of the WI DNR, Jefferson County, and the City of Watertown) that SPX intends to conduct a "self-implementing on-site cleanup and disposal of PCB remediation waste" for the captioned site.

SPX had previously received EPA's approval for a partial removal of PCB surficially contaminated concrete flooring and encapsulation of other flooring (40 CFR 761.61 (c)) dated 28 March 2011. As discussed, based on the deteriorating condition of the building and in consultation with the City, SPX has decided to demolish the building and all associated structures and completely remediate the facility in accord with 40 CFR 761.61 (a).

Enclosed is documentation covering the nature of the PCB contamination, the summary of procedures and methods for sampling, characterization and analysis, the location and extent of the contamination, and a cleanup plan including schedule, disposal plan and the demolition and remedial approach.

SPX CORPORATION
13320 BALLANTYNE CORPORATE PLACE
CHARLOTTE, NC 28277-2706
UNITED STATES OF AMERICA

www.spx.com

Since we believed that we were close to an EPA approval several weeks ago, we are asking for an expedited review of this material in order that our demolition and remediation contractor may continue with his work at the site. Should you need any further information please contact our consultant, Dave McNichol of TRC immediately.

Thank you in advance for your attention to this matter.

Very truly yours,

Walter Galacki
Director Environmental
For SPX Corporation, Owner and Operator and Successor in Interest of the former SPX Lindberg site

W/enclosures

CC: Jefferson County Health Department, Environmental Health Section
WI DNR, Remediation and Redevelopment Program
City of Watertown, J.J. Holloway, PE
TRC, Dave McNichol
Nixon Peabody, Al Floro

TRC

SELF-IMPLEMENTING ON-SITE CLEANUP AND DISPOSAL OF PCB REMEDIATION WASTE

SPX LINDBERG FACILITY
WATERTOWN, WISCONSIN

Prepared for

SPX CORPORATION
Charlotte, North Carolina

Prepared by

TRC
Windsor, CT

November 2014

TABLE OF CONTENTS

1.0 INTRODUCTION

1.1 PURPOSE

SPX Corporation (SPX) wishes to perform a *Self-implementing on-site cleanup and disposal of PCB remediation waste* at the SPX Lindberg facility located at 304 Hart Street, Watertown, WI 53094. The entire project also involves the complete demolition and remediation of the facility. SPX had received EPA's approval for a risk-based approach under 40 CFR 761.61(c). See EPA letter dated March 28, 2011.

SPX, however, no longer believes the facility is useful in its' deteriorated condition and now wishes to completely demolish the buildings and remediate the site and seeks, with the help of the City of Watertown, to find a redeveloper. Thus, SPX is seeking EPA's approval under 40 CFR 761.61(a) in order to perform a *Self-implementing on-site cleanup and disposal of PCB remediation waste.*

Certification

1.2 BACKGROUND

Delta Consultants, Shoreview, MN has investigated the Lindberg facility for PCBs and has reported on those investigations. EPA's prior approval was based upon that reporting. TRC has been engaged by SPX to manage/oversee the remediation and demolition. As such TRC and SPX are continuing to rely upon Delta's earlier work and their report "Risk-Based Remediation Plan for PCB-Contaminated Concrete" dated August 2, 2010 and (the subsequent modifications and revisions) it is incorporated herein. For the reader's convenience and reference the material follows this report.

The PCB contamination observed at the former Lindberg facility is believed to have been from the manufacture of electrical transformers during a period from 1953 until 1971. No spill event nor history has been identified through a historical review as well as interviews with former employees. The primary PCB contamination is of concrete flooring (within the building) and to a lesser extent a small area outside the building which is a small loading/shipping pad and adjacent soils. Notably, the PCB contamination is not at depth in the concrete flooring, thus PCB contamination is not expected in the substrate beneath any flooring. See especially the Figures in the Delta Report.

SPX, in conjunction with the facilities full demolition and remediation, will remove all Asbestos Containing Building Materials (ACM), Universal Waste (batteries, lamps-both florescent and metal-halide, mercury in electrical components, CPUs, etc.), decommission all firewater, electrical, water and sewer, remove all oils, lubes, etc. For the demolition all C & D waste will be disposed at the local Subtitle D landfill operated by Waste Management and located in Watertown. The ACM is to be transported and disposed at the Pheasant Run Landfill operated by Waste Management and located in Bristol, WI. Universal waste is destined for Mercury Waste Solutions in Union Grove, WI. And, the PCB concrete along with a minor amount of soil (loading pad area) would be manifested and transported to a Subtitle C Landfill operated by Heritage Environmental Services located in Roachdale, IN.

2.0 NATURE OF PCB CONTAMINATION

The nature of the contamination is fully described and explained by Delta in their report. The sampling, the analysis, the PCB results and the graphic (figures) pattern of PCB contamination is all contained in section 2 of their report. SPX and TRC are relying on this information for the Cleanup discussion which follows in section 3. Please see section 2 of the Delta report for a description of the nature of the contamination.

3.0 CLEAN UP PLAN

The SPX former Lindberg facility had been principally a manufacturer of industrial ovens, furnaces, and environmental test chambers with an associated office activity. Early in its history the facility had also produced electrical transformers. The manufacturing areas were in some cases added buildings and in other cases large rooms or other functional areas within a given building-see figures. SPX will perform a self-implementing clean up resulting in PCB concentrations for the bulk PCB remediation waste of less than 1 mg/kg and unlimited use for the remaining land after all remediation and demolition are completed (40 CFR 761.61(a)(4)(i)(A). The proposed clean up includes the removal of PCB contaminated concrete, the removal of a minor quantity of PCB contaminated soils and a loading pad (only outdoor area), and the transportation and disposal of these materials to a RCRA Subtitle C facility all as more fully described below.

3.1 Bulk PCB Remediation Waste Removal and Disposal

SPX intends to remove all of the concrete flooring shown on Figure 1. The contractor hired by SPX, Apollo Dismantling, has mobilized to the site and is currently preparing for the demolition and remediation. At the moment Apollo and its subcontractors are removing all ACM, removing all Universal wastes, collecting all lamps and ballasts, and draining and arranging for utility shutoff and blocks. Once this work is completed Apollo had planned to cut out and remove all PCB concrete for Title C Landfill disposal. See schedule below.

SPX proposes to remove all of the PCB contaminated flooring proposed in the previous approval (all of the areas which were to be removed and all the areas which were to be encapsulated). See relevant parts of Delta section 3. The removal will be in all cases to full floor depth. In addition, SPX proposes to go beyond the limits previously estimated as the 10 mg/kg line by Delta; namely to the next core location (still locatable) where a measured result is less than 10 mg/kg. Thus existing measured values and full depth floor removal ensures the objective is met.

Remaining flooring will then be removed from all areas (rooms and/or buildings) where a PCB floor removal has occurred. The material will be sized and placed in a single on site pile for further use on site, if possible. Prior to any on-site use the pile will be sampled and analyzed to ensure that the material is less than 1 mg/kg PCB. If less than 1 mg/kg PCB, it is candidate material for onsite use to fill any basement voids from the demolition. Should the pile material test between 10 and 1 mg/kg it will <u>not</u> be used onsite but will be disposed into a Subtitle D landfill, either for temporary cover or as fill. Thus any PCB concrete greater than 10 mg/kg (and minor soils quantity) will be disposed at a Subtitle C facility; any PCB concrete between 10 and 1 mg/kg will be disposed in a Subtitle D landfill facility; and,

any PCB concrete less than 1 mg/kg may be retained for use to fill basement voids onsite-or if an excessive quantity exists may also be disposed in a Subtitle D landfill facility.

3.2 SCHEDULE

The proposed schedule is as follows:

ACM removal 24 Oct-26 Nov
PCB bulk removal 8 Dec-15 Jan
Lights/ballasts/U waste 17 Nov-15 Dec
Demolition 8 Dec-15 Feb
Restoration Spring 2015

3.3 Verification

Verification sampling is necessary for two areas. The removal of the concrete pad in the rail car loading/unloading area (including soils) and the concrete removed pile which will be less than 10 mg/kg and likely less than 1 mg/kg. In both cases EPA Method 8082 will be used for sample analysis. The outdoor excavation will be sampled with 2-sidewalls samples and a bottom invert sample. The concrete pile will be sampled with 6 samples, composited to 2 for analysis.

Since there was no indication in any of the Delta investigation (more than 585 concrete cores) of PCB at floor depth, it is not necessary to sample any substrate below the flooring.

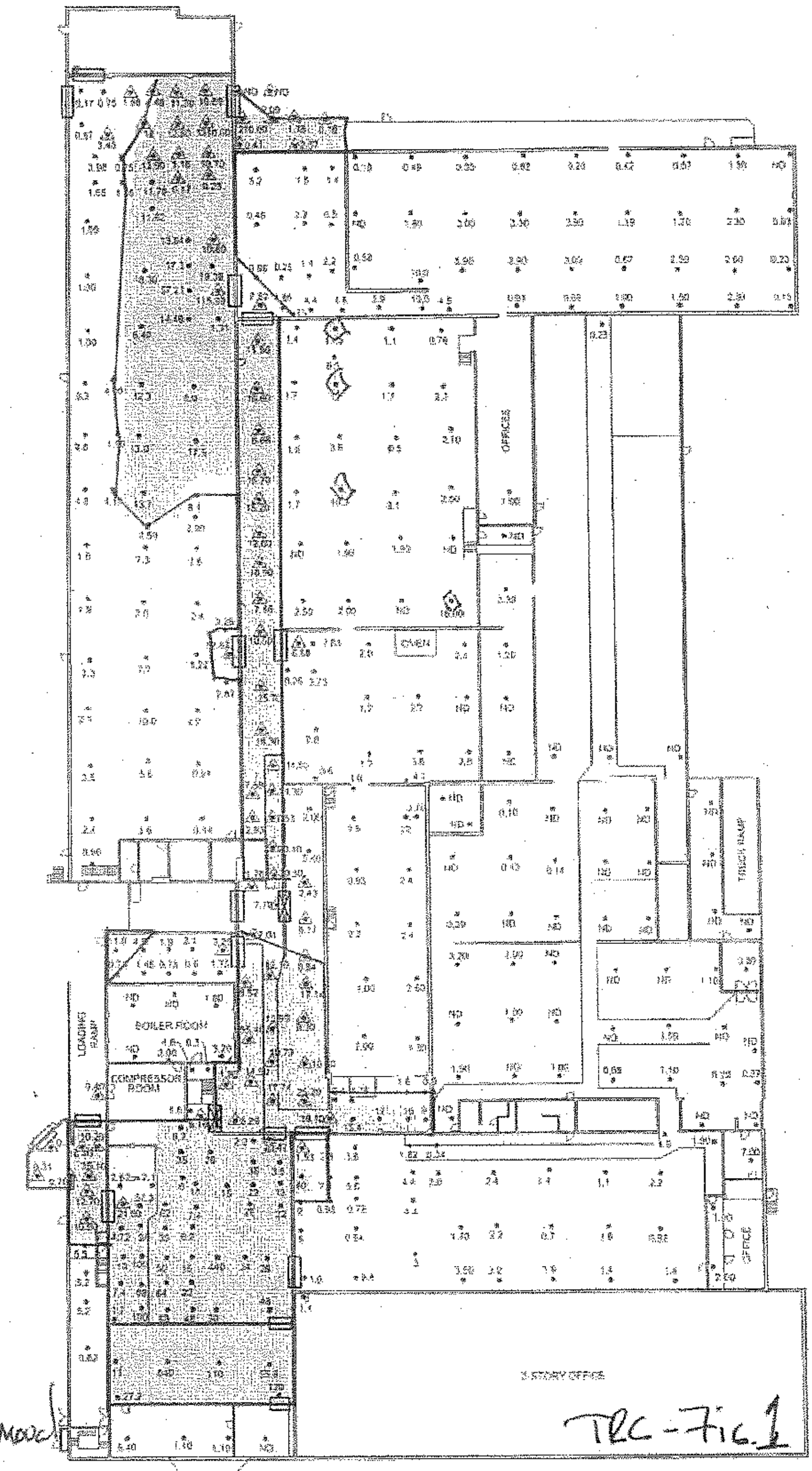
3.4 Site Restoration

After completion of all the demolition and remediation activities the site will be restored. The front side walk on Hart Street will remain. The voids of former basement areas will be filled with the concrete from the less than 1 mg/kg pile (assuming it has been verified as above described). After the voids are filled fresh stone will be imported to cover the concrete areas. This will be somewhat crowned to allow that no ponding should occur over time. The property will then be idle until redevelopment can be planned and implemented.

4.0 RECORDKEEPING

A file containing all sampling, analysis, results, graphic depictions of results, shipping and manifesting documents including weight tickets and summaries will be created. Several electronic copies of the record compilation will be made. An electronic copy will be forwarded to USEPA Region 5 PCB Coordinator and to WI DNR PCB Section.

Since it is a cleanup to less than 1 mg/kg PCB no further actions are anticipated.



☐ PCB Removal

TRC - Fig. 1

LEGEND:

- ☒ – UNUSED DOORWAY
- ☐ – CURRENT DOORWAY
- * – CONCRETE SAMPLE LOCATION
- 10.89 – PCB SAMPLE RESULTS IN MILLIGRAMS PER KILOGRAM (mg/kg)
- ND – NOT DETECTED
- ▒ – PCB RESULTS WARRANTING REMEDIATION

FIGURE 6
PROPOSED AREAL EXTENT OF REMEDIATION
SPX LINDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN

PROJECT NO.	PREPARED BY	DRAWN BY
0MD0092 15	KI	DD
DATE	REVIEWED BY	FILE NAME
5/7/10		Watertown-B

DELTA

RISK-BASED REMEDIATION PLAN FOR PCB-CONTAMINATED CONCRETE

SPX LINDBERG FACILITY

304 HART STREET

WATERTOWN, WISCONSIN

DELTA PROJECT NO. 9M0909245

Prepared for:

SPX Corporation
13515 Ballantyne Corporate Place
Charlotte, North Carolina 28277
(704) 752-4430

Prepared by:

Delta Consultants
5910 Rice Creek Parkway, Suite 100
Shoreview, Minnesota 55126
(651) 639-9449

December 6, 2010

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RISK-BASED REMEDIATION PLAN FOR PCB-CONTAMINATED CONCRETE

SPX LINDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN
DELTA PROJECT NO. 9M0909245

1.0 INTRODUCTION

1.1 Purpose

Delta Consultants (Delta), on behalf of SPX Corporation (SPX), is pleased to present this *Risk-based Remediation Plan for PCB-Contaminated Concrete* for management of polychlorinated biphenyl (PCB)-contaminated concrete at the SPX Lindberg facility located at 304 Hart Street in Watertown, Wisconsin (**Figure 1**). The purpose of this report is to fulfill the application requirements of the Environmental Protection Agency (EPA) Toxic Substance Control Act (TSCA) PCB regulations, 40 CFR 761.61(c) *Risk-based disposal approval* for PCB remediation waste. This report presents the following:

- Site characterization data collected to date;
- Proposed cleanup plan for the facility; and
- Plan for future management of the PCB-contaminated soil and concrete.

Since the proposed cleanup plan includes off-site disposal of PCB remediation waste, engineered controls, and a deed restriction to limit exposure, this Risk-based Remediation Plan is being submitted with the goal of allowing PCB remediation waste to remain at the facility at a concentration of 10 milligrams per kilogram (mg/kg) PCBs.

1.2 Background Information

The SPX Lindberg facility is located 1,000 feet east of the Rock River and immediately south of the Chicago, Milwaukee, St. Paul and Pacific railroad in Watertown, Jefferson County, Wisconsin (**Figure 1**). The subject property consists of approximately 5.3 acres of land that is occupied by an approximately 174,000 square foot manufacturing and office building. The Subject Property is bordered by a storage warehouse and railroad tracks to the north, a JohnsonDiversey (formerly U.S. Chemical Company) facility to the east, Hart Street and a parking lot to the south, and residential buildings to the west.

The subject property was originally developed in the early 1920s as a woodworking/ manufacturing facility. The majority of the current building infrastructure was constructed

in the 1950s, when it was occupied by Hevi-Duty Electric Company, a manufacturer of electrical transformers, heat treating furnaces, and hot plates. According to historical documents, the combined operations of transformer and furnace manufacturing were moved to Watertown, Wisconsin in 1953. In 1962, a limited portion of the Watertown facility produced the larger transformers with a maximum rating of 2000 KVA. All transformer production at the facility ended in 1971.

According to Mr. Jeff Raabe, former manufacturing supervisor at the facility and facility employee since 1973, recent operations consisted of the manufacture of a wide array of industrial ovens, refrigeration units, environmental test chambers, industrial manufacturing furnaces, and custom products. Manufacturing operations were terminated at the facility in late 2005. The facility is currently unoccupied and largely vacant and is being placed on the market for sale. The potential future facility use is anticipated to remain industrial.

No PCB releases have been reported or are known to have occurred within the facility. The presence of PCB-contaminated concrete was discovered during routine Phase II Environmental Assessment (EA) activities performed on October 1, 2009, prior to SPX placing the facility up for sale. Sampling activities were performed to evaluate for the potential presence of PCBs on the concrete floor surface. Surface wipe sampling was performed in an approximate 60-foot square-based grid pattern throughout the facility. Of the 49 surface wipe samples collected during the initial testing, five samples indicated PCB concentrations greater than 10 micrograms (µg) per 100 square centimeters (cm^2) total PCBs.

2.0 NATURE OF CONTAMINATION

Between October 2009 and May 2010, Delta has performed six PCB delineation events at the SPX Lindberg facility to assess the extent and magnitude of PCBs on top of and within the concrete floor. These sampling events included both PCB wipe and bulk concrete sampling and occurred on October 1, October 27, and December 28-30, 2009 and January 25-28, March 16-April 2, and May 4-11, 2010. Photographs taken during the sampling events are presented in **Appendix A**.

2.1 PCB Wipe Sampling

In order to initially characterize the horizontal extent of PCBs on the concrete floor surface, a PCB wipe sampling program was performed. A total of 72 wipe samples were collected

from the floor in an approximate 60-foot square-based grid pattern throughout the facility. The sample locations are shown on **Figure 2**. No floor coverings were compromised during sample collection; sample locations which were proposed in areas covered with carpeting were moved to the nearest non-carpeted area.

The wipe samples were collected using hexane-preserved sorbent pads provided by Pace Analytical Services, Inc. (Pace). The procedure for obtaining a wipe sample for PCB analysis consisted of rubbing the hexane-soaked pad within a 10 cm by 10 cm (100 cm^2) sample area, using a prescribed wiping pattern that followed the horizontal and vertical axes of the area. The pad was then placed into a 4-ounce amber glass container and the cover was secured tightly on the jar. The wipe samples were submitted to Pace for analysis for PCBs by EPA Method 8082. Laboratory analytical reports for the wipe samples are presented in **Appendix B**.

Analytical results for surface wipe samples are summarized on **Table 1** and **Figure 2**. PCB concentrations ranged from less than the laboratory reporting limit of 1.0 µg per 100 cm^2 to 59.7 µg/100 cm^2. The PCB concentrations were compared against the TSCA PCB surface cleanup standard of 10 µg/100 cm^2. Twenty-six of the wipe samples did not indicate the presence of PCBs. Thirty-six wipe samples contained PCBs at concentrations between 1 and 10 µg/100 cm^2. Ten wipe samples indicated PCB concentrations greater than 10 µg/100 cm^2. These samples included:

- B1 (59.7 µg/100 cm^2) and W3 (13.0 µg/100 cm^2), located near the northeast corner of the "Big Bay" area in the vicinity of a loading area;
- W5 (11.7 µg/100 cm^2), B4 (23.7 µg/100 cm^2), W9 (14.4 µg/100 cm^2), B6 (23.2 µg/100 cm^2), and W10 (10.8 µg/100 cm^2), located along the "Heavy Assembly Materials" storage corridor;
- B7 (11.5 µg/100 cm^2) and W33 (12.4 µg/100 cm^2), located south of the "Heavy Assembly Materials" storage corridor near the old shipping office; and
- A8 (10.4 µg/100 cm^2), located in a loading dock area near the southwest corner of the facility.

According to Mr. Raabe, the "Heavy Assembly Materials" area, an approximately 16-foot wide by 315-foot room located in the west-central portion of the facility, was formerly used as a staging area for parts and equipment prior to being moved into the product assembly rooms.

2.2 PCB Bulk Concrete Sampling

In order to evaluate whether PCBs have penetrated the concrete floor, 585 bulk concrete samples were collected from 406 locations throughout the facility. The locations of these samples are shown on **Figure 3**.

- Concrete samples B1, B4, B6, B7, and A8 were collected at five locations previously sampled using PCB wipe sampling techniques and exhibiting PCB concentrations exceeding the surface standard of 10 µg/100 cm^2 PCBs.
- Concrete samples 1 through 36 were collected within three areas (the northwest loading area, the southwest loading dock, and the "Heavy Assembly Materials" corridor) previously sampled using PCB wipe sampling techniques and exhibiting PCB concentrations exceeding the surface standard of 10 µg/100 cm^2 PCBs.
- Concrete samples 37 through 171 were collected at approximately 10-foot intervals to expand on the areas where PCB impacted concrete was previously identified at concentrations greater than the bulk concrete standard of 1 mg/kg PCBs.
- Concrete samples 172 through 273 were collected at approximately 20-foot intervals to expand on the areas where PCB impacted concrete was previously identified at concentrations greater than the bulk concrete standard of 1 mg/kg PCBs.
- Concrete samples 274 through 401 were collected at approximately 20-foot intervals throughout the remaining manufacturing portions of the facility.

All manufacturing areas of the facility were sampled with the exception of an 11,000-square foot room in the eastern side and a 1,600-square foot room on the northern side. According to Mr. Raabe, the room on the eastern side was constructed circa 1978, which was after the date that transformer production ended at the facility (1971), and was used for oven assembly. The room to the north was added in the early 1990s and was used as a cutting room.

Bulk concrete samples were collected in general accordance with EPA Region 1 *Standard Operating Procedure for Sampling Concrete in the Field* (December 30, 1997). The sample holes were advanced using a hand-held rotary hammer/impact drill equipped with 1-inch and ½-inch masonry bits. The 0-1 inch sample was collected by advancing a hole into the concrete to a depth of one inch using the 1-inch bit. Concrete dust generated from the drilling of the sample interval was collected using clean disposable sampling tools and placed into a sample jar. The drill hole was vacuumed thoroughly to prevent cross-contamination between sampling intervals. The hole was further advanced to a depth of

either 3 (or 4) inches using the ½-inch bit and the concrete dust was collected for the 1-3 (or 2-4) inch sample. The drill bits were decontaminated between holes using a soap and water solution and potable water rinse. Three to four holes were advanced at each sample location to obtain a sufficient sample weight for analysis. The bulk concrete samples were submitted for laboratory analysis for PCBs by EPA Method 8082. Laboratories utilized throughout this project include Pace Analytical Services (Minneapolis, Minnesota), TestAmerica (Watertown, Wisconsin), and New Age/Landmark Mobile Analytical Services (New Haven, Michigan). Laboratory analytical reports for the bulk concrete samples are presented in **Appendix C**.

Analytical results for the bulk concrete samples are summarized on **Table 2** and **Figures 4 and 5**. PCBs were detected throughout the manufacturing portion of the facility. PCB concentrations in the bulk concrete samples ranged from below the detection limit to 3,310 mg/kg.

The bulk concrete sample PCB concentrations were compared against the EPA cleanup level of 1 mg/kg PCBs for bulk remediation waste in high occupancy (an average of 6.7 hours or more a week) areas. Of the 406 near-surface (0 to 1 inch deep) concrete samples collected, 294 samples exhibited PCB concentrations above 1 mg/kg PCBs. Deeper samples (1 to 3 inches deep or 2 to 4 inches deep) were collected from 177 of these locations. PCB concentrations were observed to decrease with depth at 176 of the 177 locations, with only 19 of the deeper samples exhibiting PCB concentrations above 1 mg/kg PCBs.

Two locations which exhibited PCB concentrations above 1 mg/kg PCBs at a depth of 1 to 3 inches were sampled from a depth of 3 to 6 inches. Concrete 31, located in the northwest loading area, contained 3,310 mg/kg PCBs in the 0 to 1 inch deep sample and 1,440 mg/kg in the 1 to 3 inch deep sample. No PCBs were detected in the bulk concrete sample collected at a depth of 3 to 6 inches (reporting limit of 0.1 mg/kg for each Aroclor). Concrete sample B6, located near the center of the "Heavy Assembly Materials" area, contained 7.53 mg/kg PCBs in the 0 to 1 inch deep sample and 2.49 mg/kg in the 1 to 3 inch deep sample. No PCBs were detected in the bulk concrete sample collected at a depth of 3 to 6 inches (reporting limit of 0.1 mg/kg for each Aroclor).

Bulk concrete samples were collected from 3 areas located on the outside of the facility: the loading ramp near the southwest corner; the truck ramp located on the east side; and the rail

spur loading area on the north side. Four of the six samples collected from the rail spur loading area (Concrete 36, 39, 40, and 41) contained PCBs at concentrations exceeding 1 mg/kg PCBs. None of the samples collected from the other two areas contained PCBs at concentrations above 1 mg/kg PCBs.

3.0 CLEANUP PLAN

The SPX Lindberg facility is a manufacturing and office building. PCB-contaminated concrete is present throughout the manufacturing portion of the facility. Should a self-implementing cleanup be conducted, a cleanup level for bulk PCB remediation waste of ≤1 mg/kg would be required without further conditions per 40 CFR 761.61(a)(4)(i)(A). However, an alternative, risk-based cleanup level may be used, pending EPA approval, in accordance with 40 CFR 761.61(c). Based on preliminary conversations with personnel from EPA Region 5 and the Wisconsin Department of Natural Resources (WDNR), a risk-based cleanup level of ≤10 mg/kg PCBs may be an acceptable site-specific cleanup level for this facility.

A quantitative human health or environmental risk assessment has not been conducted. With the exception of the concrete pad in the rail spur loading area, the PCB contamination is located within the confines of the facility building. Vertical bulk concrete sampling results demonstrate that the PCBs have not penetrated the concrete floor to the underlying soil. Since the contaminated areas which will remain at the property following the proposed cleanup are confined within the physical enclosure of the building, no associated risks to the environment are anticipated. Access to the contaminated areas is provided by entrance doors which are currently locked. Under potential future use conditions, the anticipated use of the building is industrial. The potential occupational exposure in this scenario stems primarily from dermal contact with the contaminated floor.

The proposed site cleanup presented below includes off-site disposal, engineered controls, and a deed restriction to limit exposure. Based on its industrial use and limited accessibility, a risk-based cleanup level of ≤10 mg/kg is being requested for this facility. Approximately 20,650 square feet of concrete contains PCBs at concentrations greater than 10 mg/kg (**Figure 6**).

The following remediation methods are proposed for the facility in order to address the PCBs at concentrations greater than 10 mg/kg:

- Bulk PCB Remediation Waste removal and off-site disposal of the 700 square-foot concrete pad in the rail spur loading area.
- Continued Use Authorization, which includes cleaning per Subpart S and two coats of epoxy, for the in-place management of 12,150 square feet of PCB-contaminated, bare concrete flooring.
- Continued Use Authorization, which includes superficial cleaning and two coats of epoxy, for the in-place management of 7,000 square feet of PCB-contaminated, epoxy-coated concrete flooring.
- Bulk PCB Remediation Waste removal and off-site disposal of approximately 800 square-feet of PCB-contaminated concrete flooring located at 8 non-contiguous locations.

The locations within the facility proposed to be cleaned by these remediation methods are shown in **Figure 7.**

3.1 Bulk PCB Remediation Waste Removal and Disposal

A 16-foot by 43-foot concrete pad located in the in the rail spur loading area to the north the facility building was found to contain PCBs at concentrations greater than 10 mg/kg (**Figure 7; Appendix A, Photograph 1**). A bulk concrete sample collected from Concrete 36 contained 201 mg/kg PCBs in the 0 to 1 inch sample interval. In order to manage the PCBs in this area, SPX will remove the entire concrete pad in accordance with 40 CFR 761.61(a)(5)(i). The bulk PCB remediation wastes will be managed and disposed off-site in a TSCA-permitted landfill according to the applicable waste classification and disposal regulations as specified under 40 CFR 761.61(a)(5)(i)(B)(2).

Following removal of the concrete pad, a confirmation sample will be collected from the soil beneath the location of Concrete 36. This sample will be analyzed for PCBs by EPA Method 8082. A bulk concrete sample previously collected from Concrete 36 contained 2.29 mg/kg PCBs in the 1 to 3 inch sample interval. Bulk concrete samples collected from the other five locations in the concrete pad did not detect the presence of PCBs at a depth of 1 to 3 inches, so no additional confirmation sampling will be performed beneath the concrete pad. Should the soil sample contain PCBs at a concentration of ≤1 mg/kg, the cleanup will be considered complete. If the soil sample contains >1 mg/kg PCBs, additional soil sampling would be conducted and soils containing >1 mg/kg PCBs would be removed and disposed off-site along with the concrete pad.

3.2 Continued Use Authorization

The 40 CFR 761.30(p) *continued use of porous surfaces contaminated with PCBs regulated for disposal by spills of liquid PCBs* authorization will be implemented for the in-place management of 19,150 square feet of PCB-contaminated concrete located within the facility. The proposed cleanup level for the work described in this section is ≤10 mg/kg PCBs.

The proposed cleanup area has been subdivided into two distinct areas with respect to the surface condition of the concrete. The first area consists of 12,150 square feet of bare concrete flooring stretching from the north end of the facility to approximately 440 feet to the south, including the loading dock located on the west side of the building (**Figure 7; Appendix A, Photographs 2 through 5 and 8**). The second area consists of a 7,000-square foot former assembly area near the southern end of the facility (**Figure 7; Appendix A, Photographs 6 and 7**). The floor in this area is covered with a white epoxy coating.

3.2.1 PCB Source Control

The first step of implementing the 761.30(p) continued use authorization requires the removal of the source causing the release of PCBs. No PCB releases have been reported or are known to have occurred within the facility. The results of the investigation discussed above do not indicate a point source of the PCB contamination. The results of a Phase I Environmental Site Assessment (EA) performed at the facility indicated the potential historical presence of PCBs related to the former manufacture of electrical transformers at the facility. According to information presented in the EA report, dated September 23, 2009:

> *The second suspect REC consists of the former manufacture of electric transformers at the Subject Property by the Hevi-Duty Company in the 1950's. Historically, manufacturers of transformers were known to employ dielectric fluids containing polychlorinated biphenyls (PCBs). This condition is characterized as a suspect REC since no direct evidence in the form of spills or releases of transformer fluids are known, nor have any indications of the use of PCB-containing fluids been directly identified at the Subject Property. However, the manufacturing of electric transformers at the Subject Property is indicated in a 1956 Sanborn map and the Hevi-Duty Company is known to have historically used PCB containing transformer fluids at other facility locations in the United States.*

Information regarding Hevi-Duty Company historical operations was obtained from the SolaHD website (http://www.solaheviduty.com). According to the company's historical summary, the combined operations of transformer and furnace manufacturing were moved to Watertown, Wisconsin in 1953. In 1962, a limited portion of the Watertown facility

produced the larger transformers with a maximum rating of 2000 KVA. All transformer production at the facility ended in 1971.

3.2.2 Decontamination and Coating Methods

Prior to the initiation of cleanup activities at the facility, all moveable equipment and materials will be removed from the areas to be cleaned. The 12,150 square feet of bare, PCB-contaminated concrete floor will be cleaned in accordance with the double wash/rinse procedure described in 40 CFR 761 Subpart S. This procedure is intended for the decontamination of non-porous surfaces, but 761.30(p) requires that this method be used to prepare PCB-contaminated concrete for encapsulation. Following an initial vacuum to remove loose dust and bird waste, the surface washing steps in this area will include 1) high-pressure steam wash with concrete cleaner/degreaser, 2) potable water rinse, 3) power scrub with a cleaning/degreasing and muriatic acid etchant solution, and 4) high-pressure steam rinse.

The 7,000 square feet of epoxy-coated, PCB-contaminated concrete floors will be cleaned in a manner less stringent that the double wash/rinse procedure. The reason for this is that while bulk concrete samples collected from below the epoxy-coated surface in this area contained elevated levels of PCBs, wipe samples taken from the top of the epoxy-coated surface did not exhibit PCBs above 10 µg/100 cm^2. Following an initial vacuum to remove loose dust and bird waste, the surface washing steps in this area will include a 1) high-pressure steam wash with concrete cleaner/degreaser, 2) a light scuffing of the epoxy-coated surface with 100+ grit sandpaper, and 3) a final vacuum and rinse.

Following the surface washing activities and once the surface has been allowed to dry for a minimum of 24 hours, an epoxy encapsulant will be placed on the concrete surface according to the requirements of 40 CFR 761.30(p)(1)(iii)(A). Two coats of epoxy will be applied to the floor surface. The two coats of epoxy will consist of contrasting colors so that any wearing of the topcoat can be detected. In the area where a white epoxy coating already exists, one additional coat will be applied in a contrasting color.

Once the epoxy has dried, labels will be placed on the encapsulated floor surfaces to indicate that PCBs remain in the underlying concrete as specified under 40 CFR 761.30(p)(1)(iii)(B). The labels, described in 761.45, will be applied at the entrances, corners, and central portions of the encapsulated area.

3.2.3 Disposal

Wastes generated during the double wash/rinse procedure and encapsulation may include water mixed with detergent, water mixed with spent degreaser, used absorbent materials, and other equipment. These wastes will be managed according to applicable waste classification and disposal regulations as specified under 40 CFR 761.378(c).

3.3 Bulk PCB Remediation Waste Removal and Disposal

Besides the 19,150 square feet of PCB-contaminated concrete described above, there were eight non-contiguous concrete sample locations exhibiting PCB concentrations greater than 10 mg/kg (**Figure 7**). These locations include the following:

- Concrete 53 - 12.67 mg/kg PCBs at 0-1 inch, 1.06 mg/kg PCBs at 1-3 inches (Wipe B5 had 2.0 µg/100 cm^2 PCBs);
- Concrete 103 – 40.0 mg/kg PCBs at 0-1 inch, non-detect at 1-3 inches;
- Concrete 178 – 11.00 mg/kg PCBs at 0-1 inch, (Wipe A7 had 4.6 µg/100 cm^2 PCBs);
- Concrete 230 – 11.50 mg/kg PCBs at 0-1 inch, non-detect at 2-4 inches (Wipe C3 had 5.6 µg/100 cm^2 PCBs);
- Concrete 239 – 22.0 mg/kg PCBs at 0-1 inch, (Wipe C6 was non-detect);
- Concrete 252 – 11.0 mg/kg PCBs at 0-1 inch, non-detect at 2-4 inches;
- Concrete 272 – 10.3 mg/kg PCBs at 0-1 inch, non-detect at 2-4 inches (Wipe C4 had 4.5 µg/100 cm^2); and
- Concrete 370 – 16.0 mg/kg PCBs at 0-1 inch.

Given the limited areal and vertical extent of PCBs in these eight locations, SPX will cut out and remove the 10-foot by 10-foot (100-square foot) section of concrete floor surrounding each sample location (**Figure 7**). The entire thickness of the concrete floor will be removed. The bulk PCB remediation wastes will be managed and disposed off-site in a TSCA-permitted landfill according to the applicable waste classification and disposal regulations as specified under 40 CFR 761.61(a)(5)(i)(B)(*2*). Since the entire thickness of the concrete floor will be removed in these areas, no confirmation sampling will be conducted.

It is anticipated that the cleanup will begin within approximately one month of EPA authorization and will take approximately one month to complete. The following is an estimated timeline to complete the site cleanup:

Item	***Date***
EPA Approval	*January 2011*
Initiate Site Cleanup	*February 2011*
Complete Site Cleanup	*March 2011*
Reporting and Deed Restriction Filing	*May 2011*

4.0 RECORDKEEPING

As requested in 40 CFR 761.61(a)(3)(i)(E), a file containing all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess the PCB contamination at the facility will be maintained at the facility and will be available for EPA inspection. The written certification, signed by a representative of SPX as both property owner and party conducting the cleanup, will be submitted as a separate document.

Because cleanup activities include the use of an encapsulant and PCB-contaminated concrete will remain at concentrations which exceed the regulatory cleanup levels, a deed restriction will be recorded within 60 days of the completion of the cleanup activities in accordance with 40 CFR 761.61(a)(8)(i). A written certification indicating that the deed restriction has been filed will be submitted to the EPA Regional Manager.

Long-term management of the PCB-affected concrete will be necessary. An operations and maintenance management plan will be developed to maximize employee protection. Components of the management plan will include training information for facility workers to inspect the encapsulant for wear and damage, procedures for repairing the encapsulant as needed, and a safety plan for workers in the event that they need to penetrate the encapsulant and drill into the concrete. The management plan will also include a plan for addressing the ultimate removal and disposal of PCB-contaminated concrete and soil remaining beneath the encapsulant for the point in time when the property is adapted for another use or the building demolished.

5.0 REMARKS

The recommendations contained in this report represent Delta's professional opinions based upon the currently available information and are arrived at in accordance with currently acceptable professional standards. This report is based upon a specific scope of work requested by the client. The contract between Delta and its client, SPX Corporation, outlines the scope of work, and only those tasks specifically authorized by that contract or outlined in this report were performed. This report is intended only for the use of Delta's client and anyone else specifically identified in writing as a user this report. Delta will not and cannot be liable for unauthorized reliance by any other third party. Other than as contained in this paragraph, Delta makes no express or implied warranty as to the contents of this report.

This report was prepared by **DELTA CONSULTANTS.**

Karen J. Thole, P.G.
Project Hydrogeologist

Peter J. Schwalbach
Project Manager